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Dos Cabezas Mountains Wilderness Management Plan, Environmental Assessment, and Decision Record

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Dos Cabezas Mountains Wilderness Management Plan, Environmental Assessment, and Decision Record

U. S. Department of the Interior

Bureau of Land Management

Safford District

San Simon Resource Area

EA Number: (AZ-040-04-28)

Recommended by: _____ 5/18/95
Area Manager, San Simon Resource Area — Date

Recommended by: _____ 5/18/95
District Manager, Safford District — Date

Approved by: _____ 5-30-95
State Director, Arizona — Date

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Part 1 — Introduction and Area Overview

Purpose of Management Plan

This wilderness management plan establishes the objectives, policies and actions for managing the Dos Cabezas Mountains Wilderness for the 10-year period 1995-2005. The plan then sets forth a sequence for implementing these actions. This plan also fulfills the Bureau of Land Management (BLM) policy that a plan be prepared for wilderness.

This plan amends all previous planning direction for the wilderness. Specifically, this plan amends all allotment management plans written for the wilderness and the portions of the Dos Cabezas Habitat Management Plan applying to the wilderness. This plan also supersedes the Safford District Interim Guidance for Fire Suppression in Wilderness Areas (1994) and the Interim Wilderness Operation and Maintenance Plan for the Dos Cabezas Mountains Wilderness (1994).

Periodic evaluations of the plan's implementation will be conducted (Part V-Plan Evaluation). Evaluations will determine progress made toward meeting the plan's objectives. Information gathered from monitoring actions identified in the plan will be used to make those determinations. If objectives are not being met, adjustments will be made to planned actions or new actions will be developed. In the future, new issues, proposals or information will be considered in evaluations. The specific and cumulative impacts of future proposals will be analyzed through the environmental assessment process.

Location

The Dos Cabezas Mountains Wilderness is located about 12 miles east of Willcox, Arizona and 40 miles south of Safford, Arizona. The Chiricahua Mountains are to the southeast. The wilderness is approximately 200 miles southeast of Phoenix and 110 miles east of Tucson. The wilderness is within Townships 13 and 14 South, Ranges 27 and 28 East, Gila and Salt River Base Line and Meridian (Map 1).

Access

Although physical access exists, there is no legal vehicular access to the wilderness.

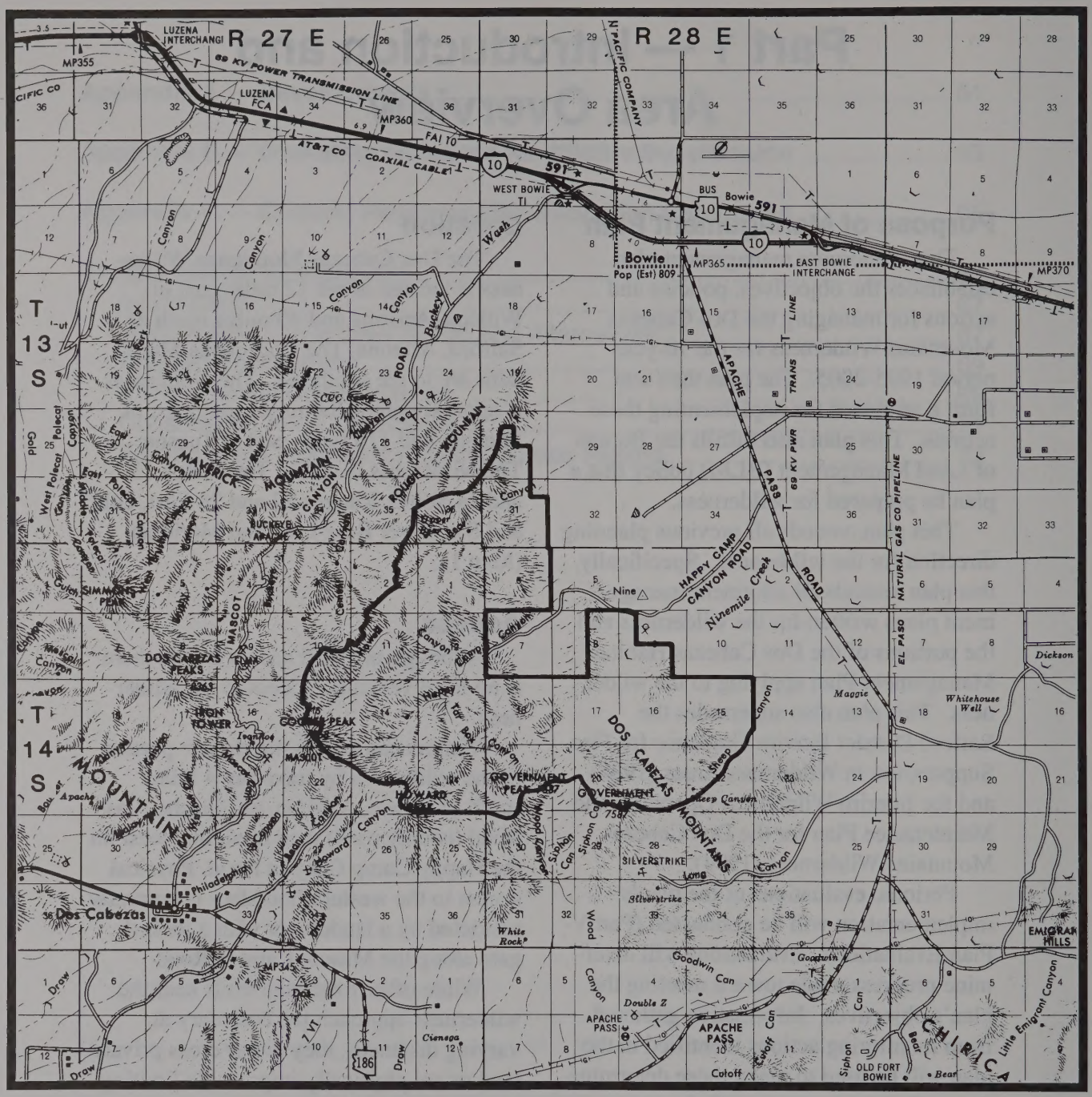
Visitors can access the eastern portion of the wilderness by traveling 4 miles south of Bowie, Arizona, on Apache Pass Road (county road) then travelling west on the Happy Camp Canyon Road. Physical access to the western boundary is currently restricted by a landowner with a locked gate along the Mascot Canyon Road.

While other roads and trails near the wilderness approach the boundary at varying distances, they either cross private land or are physically impassable limiting their usefulness as access routes.

Ownership and Land Uses

BLM administers all land within the wilderness. There are no State or private surface or subsurface inholdings or utility rights-of-way within the wilderness.

Map 1



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WILDERNESS AREA BOUNDARY

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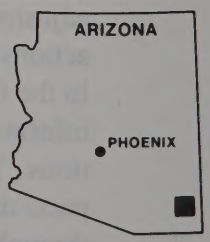


LOCATION MAP

DOS CABEZAS MOUNTAINS WILDERNESS AREA

Basemap © ADOT

0 SCALE 4
Miles

1990

Wilderness Values

The 11,998 acre Dos Cabezas Mountains Wilderness contains a variety of biological, scenic, geological, and recreational values.

Dos Cabezas Mountains Wilderness has two special features that enhance the overall values of the area - numerous springs with small patches of riparian vegetation having high importance to wildlife and a jumble of highly scenic granite boulders, balanced rocks, and outcrops. During rainy seasons, many pools and waterfalls form among these boulders. The wilderness offers many opportunities for solitude and primitive recreation, including hiking, backpacking, camping, rock scrambling, horseback riding, hunting, and sight-seeing. Long distance views of the adjacent Sulphur Springs Valley, San Simon Valley, and other mountain ranges are available from the higher peaks and ridges of the wilderness. Rugged topography and canyons offer countless places to find isolation and solitude.

The wilderness is natural in appearance. There are, however, developments associated with management of livestock grazing and wildlife. These include approximately 22 miles of fence, 2 dirt tanks, two wildlife water developments, 5 developed springs and two cabins. (Appendix A and Map 3).

Climate

Climatic conditions in the wilderness are similar to those found in southeast Arizona. Lowlands alternate with mountains to create abrupt changes in climatic conditions over short distances. Higher elevations produce cooler temperatures and more precipitation than valley locations. Summer days are hot, with temperatures reaching 105 degrees Fahrenheit. Winter mean minimum temperatures are below freezing with snow common in the higher elevations. Annual rainfall averages 7 to 16 inches in the valleys and 15 to 30 inches in the higher elevations, with most precipitation coming in the late summer months. Drought conditions are most common from April to June. Long, severe droughts occur irregularly and are usually two to five years long.

Topography

The wilderness centers on the Happy Camp Canyon watershed and includes several peaks over 7,500 feet. Cooper Peak is the high point in the wilderness at 7,950 feet. Many canyons, including Sheep and Happy Camp Canyons, wind their way among the peaks. The northeastern slope of Government Peak is a large, highly scenic area with granite outcrops and boulders.

Water Resources

The wilderness is well watered with 23 springs. Tar Box Canyon flows about 1 mile for 9 months of the year. The BLM filed with the Arizona Department of Water Resources for federal reserved water rights in 1992.

Soils

Three soil types occur within the wilderness. The Santo Tomas soils are a deep and well drained group of nearly level to moderately sloping soils on high alluvial fans. The Mokiak-Faraway-Rock outcrop complex are moderately steep to very steep soils and rock outcrops on mountains. Atacosa-Chiricahua-Rock outcrop complex are strongly sloping to steep soils and rock outcrops on hills and mountains.

Vegetation

The wilderness supports a diversity of vegetation including mountain shrub, desert shrub and small pockets of riparian vegetation. Plants include turpentine bush, snakeweed, mountain mahogany, juniper, oak, mesquite, perennial grasses, agave, prickly pear cactus, Arizona sycamore, Fremont cottonwood, velvet ash, and Arizona walnut. Gambel oak are common at the higher elevations. Riparian vegetation is very limited in area and occurs at springs. No special status plants are known to occur in the area. However, the planning area contains potential habitat for several special status plants which include the coppermine milk vetch, Texas purple spike and Bartram's stonecrop.

Vegetative trend data is used to determine changes in plant frequency over time. This data shows whether plant species increase or decrease over time. At this time the BLM has two transects in the Happy Camp allotment. Collected data from these two transects indicate that vegetative trend is static or upward as shown by an increase in perennial grasses.

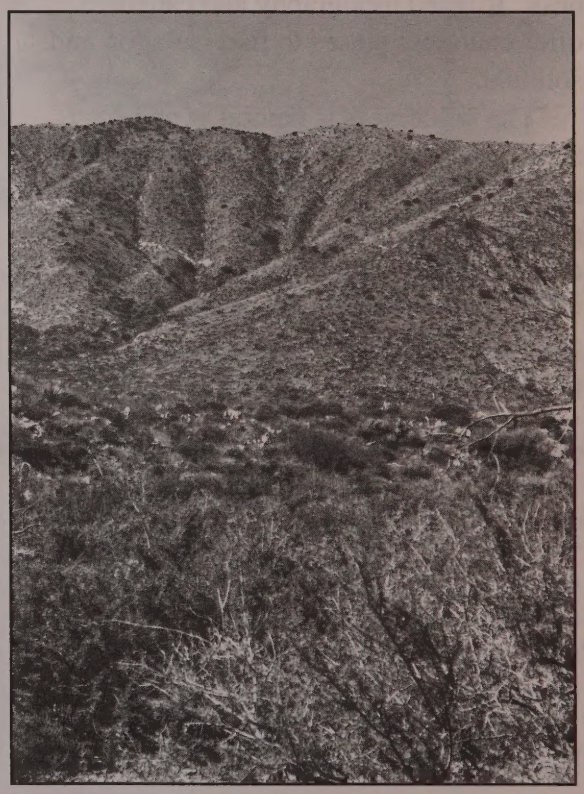
The wilderness consists of four ecological sites (Map 2). Riparian vegetation in the area has not been classified as a separate ecological site due to the small size and scattered location of sites. Ecological site is a classification of rangeland that identifies a characteristic natural plant community. Ecological sites are defined and described by soil, species composition, and the potential amount of biomass produced. Each ecological site has an ability to produce certain kinds and amounts of native vegetation.

Each site is evaluated according to the kinds and amounts of vegetation present as compared to the potential natural community and is grouped into one of the following four classes: potential natural community (PNC), high seral, mid seral and low seral stages. A seral stage refers to a step or phase of vegetative community succession.

A brief description of the composition of the potential natural community and the current composition of each site is given below. The potential natural community is the biotic community which would become established if all successional sequences were completed without interference by man under the present environmental conditions. Natural disturbances are inherent in development. The current condition and acreage of each site is listed in Table 1.

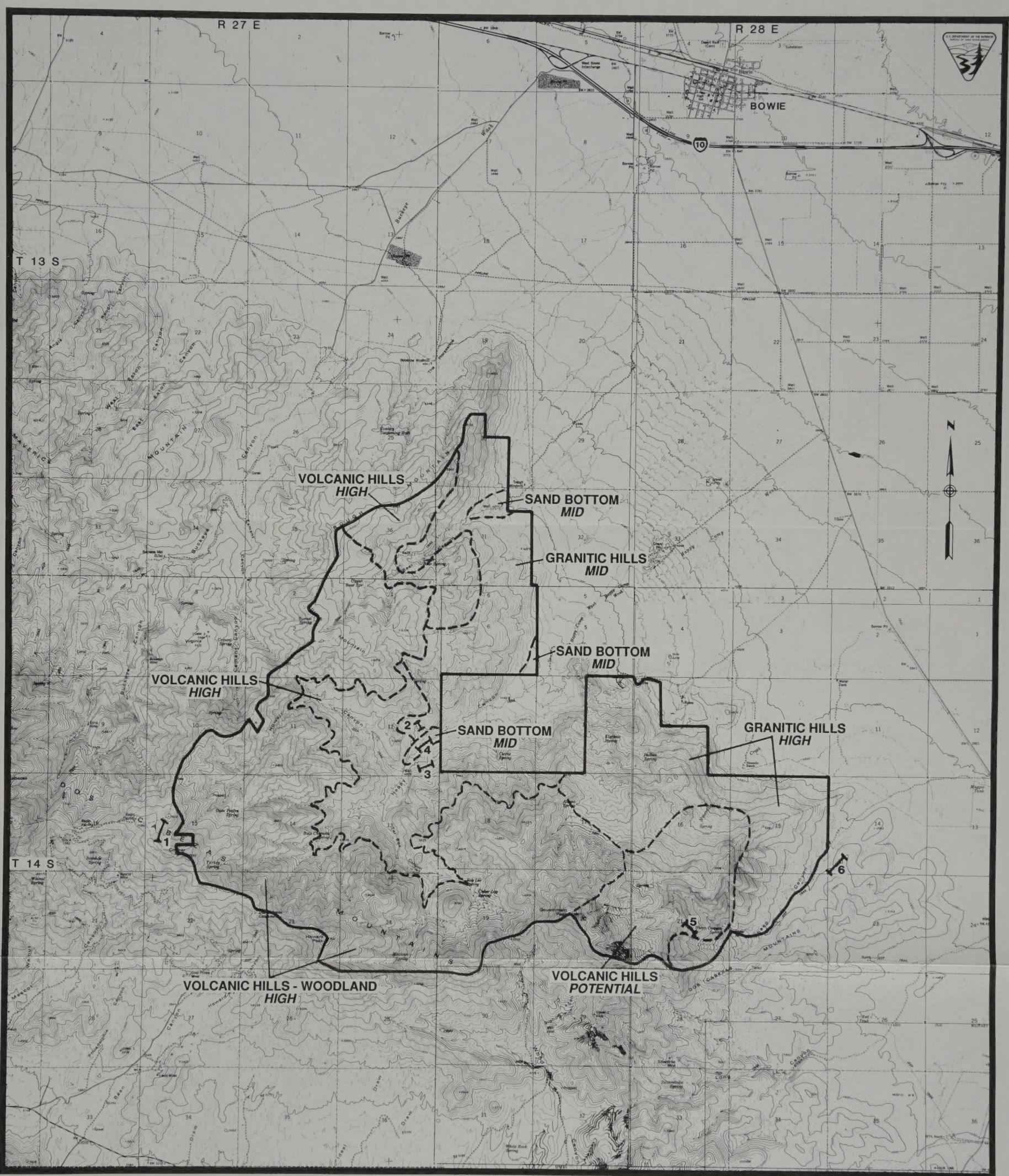
Volcanic Hills/Woodland - Currently, 5,202 acres of this ecological site are in high seral stage. Vegetation consists of 20 percent grasses, 15 percent forbs, 22 percent shrubs and 43 percent trees.

The potential natural community for this site is a mixed plant community with an overstory of evergreen oaks, pinyon and



Upper portion of Sheep Canyon.

Map 2



DOS CABEZAS MOUNTAINS WILDERNESS
ECOLOGICAL SITES AND CONDITION

TRANSECT LOCATIONS

SCALE

1 ½ 0 1 2 3 4

miles

LOCATION MAP

1994

juniper (20-30 percent canopy) and an understory of low shrubs, grasses and forbs. The aspect, or general landscape appearance, is woodland. All of the oak species and alligator juniper sprout vigorously and quickly assume dominance after fire or cutting resulting in a lower seral stage. Disturbance can increase understory shrubs like snakeweed.

The potential natural community on this site would consist of 50-60 percent grasses and grasslike plants, 10-15 percent forbs, 30-35 percent shrubs, and 20-25 percent trees.

Volcanic Hills - Currently, 1,185 acres of this ecological site are in potential natural community. Vegetation consists of 55 percent grasses, 15 percent forbs, 30 percent shrubs and trees. In addition, 2,118 acres are currently in high seral stage. Vegetation consists of 30 percent grasses, 10 percent forbs, and 60 percent shrubs and trees.

The potential natural community on this ecological site is dominated by warm season perennial grasses. Many species of shrubs are well represented on the site. Larger shrubs are concentrated at the edges of rock outcrops and in canyon bottoms. All of the major grass species are well dispersed throughout the plant community. The aspect is open grassland. This community is relatively stable with the exception of snakeweed which increases with adequate winter precipitation and decreases when winter precipitation is lacking. Natural fire is a factor in the development of this site's potential vegetation by preventing woody species invasion.

The potential natural community on this site would consist of 65-75 percent grasses, 10-15 percent forbs and 15-20 percent shrubs and trees.

Granitic Hills - Currently, 2,079 acres of this ecological site are in high seral stage. Vegetation consists of 47 percent grasses, 15 percent forbs, 38 percent shrubs and trees. In addition, 1,324 acres are currently in mid seral stage. Vegetation consists of 25 percent grasses, 15 percent forbs, and 60 percent shrubs and trees.

The potential natural community for this site is a mixture of warm and cool season perennial grasses, perennial and annual forbs, trees and shrubs. The aspect is grassland dotted with trees and shrubs. The site could deteriorate from overgrazing and lack of natural fires, causing woody species to increase and dominate. Natural fire is a factor in the development of this site's potential vegetation by preventing woody species invasion.

The potential natural community is 55-65 percent grasses and grasslike, 10-15 percent forbs and 25-30 percent trees and shrubs.

Sand Bottom - Currently, all 90 acres of this ecological site are in mid seral stage. Vegetation consists of 10 percent grasses, 10 percent forbs, 80 percent shrubs and trees.

The potential natural community for this site is dominated by grasses which produce their main growth in the summer months. Cottonwoods, walnuts, willow, hackberry or catclaw may grow in narrow strips or small clumps near main channels. The aspect is a dry wash. Natural fire interval is unknown, but fire is not considered to play a major role in development of the plant community.

The potential natural community consists of 50-70 percent grasses and grasslike plants, 5-10 percent forbs and 20-30 percent shrubs and trees.

Wildlife

The wilderness provides good habitat diversity for species typical of those associated with the desert shrub, mountain shrub, and riparian habitat of southeastern

Table 1
Ecological Site Inventory
Dos Cabezas Mountains Wilderness
1994

Ecological Site	Seral Stage	Acres
Volcanic Hills/ Woodland	High	5,202
Volcanic Hills	PNC	1,185
	High	2,118
Granitic Hills	High	2,079
	Mid	1,324
Sand Bottom	Mid	90
Total		**11,998**

Arizona. Some of the more common species are white-tail and mule deer, mountain lion, javelina, cottontail rabbit, bobcat, coyote, quail and dove. The beautiful collared lizard may be found in the upper portion of Buckeye Canyon. The peregrine falcon, an endangered species, is the only special status species known to pass through the wilderness. However the planning area contains suitable habitat for several other special status species which include the lesser long-nosed bat; bald eagle; Mexican spotted owl; Chiricahua leopard frog; California leaf-nosed bat; Mexican long-tongued bat; Chiricahua western harvest mouse; Yellow-nosed cotton rat; Northern buff-breasted flycatcher; Apache northern goshawk; ferruginous hawk; Loggerhead shrike; lowland leopard frog; and Texas horned lizard.

Arizona Game and Fish Department (AGFD) monitors the big game herd populations with annual surveys. Aerial population surveys and monitoring are low level flights conducted below 2000 feet above ground level.

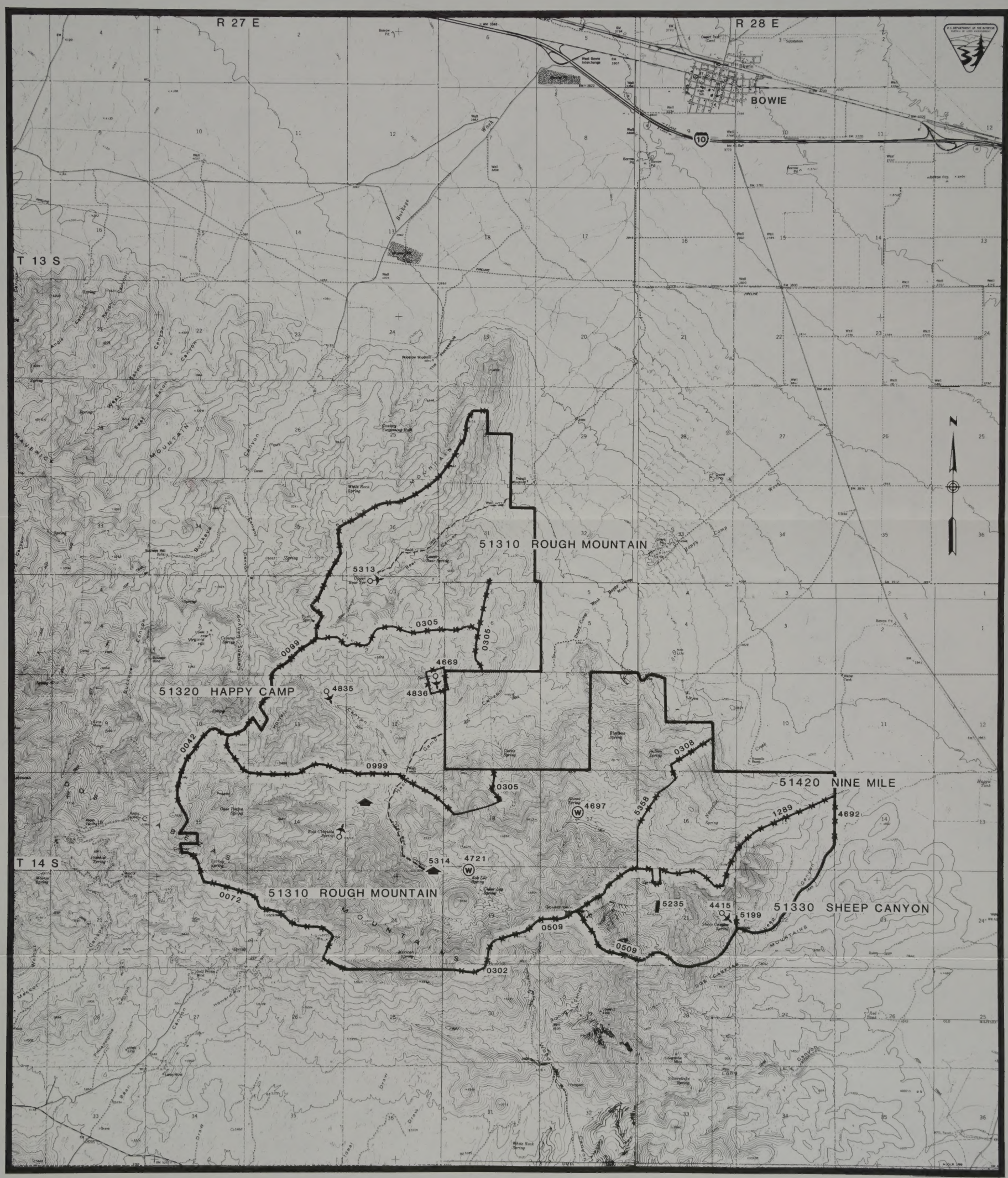
Currently one functional wildlife water development, Government Peak Slickrock Catchment, is located within the wilderness. This development consists of a small masonry dam, pipeline, and 2,000 gallon fiberglass storage tank. A second wildlife water development, Tar Box Spring, is in the wilderness but is not functional and has been partially dismantled (Appendix A and Map 3).

Recreation

No visitor use data have been collected for this area. Use is estimated at 300 visitor days a year. No change is expected during the life of this plan. Approximately half of the use occurs during deer, javelina and quail hunting seasons during the months of October through March.

No developed recreational trailheads or parking areas exist for the wilderness. The Indian Bread Rocks picnic site is adjacent to the wilderness along the Happy Camp

Map 3



LEGEND

- FENCE
- DAM
- DEVELOPED SPRING
- DEVELOPED WILDLIFE WATER
- TRAIL
- CABIN

DOS CABEZAS MOUNTAINS WILDERNESS DEVELOPMENTS

SCALE

1 ½ 0 1 2 3 4

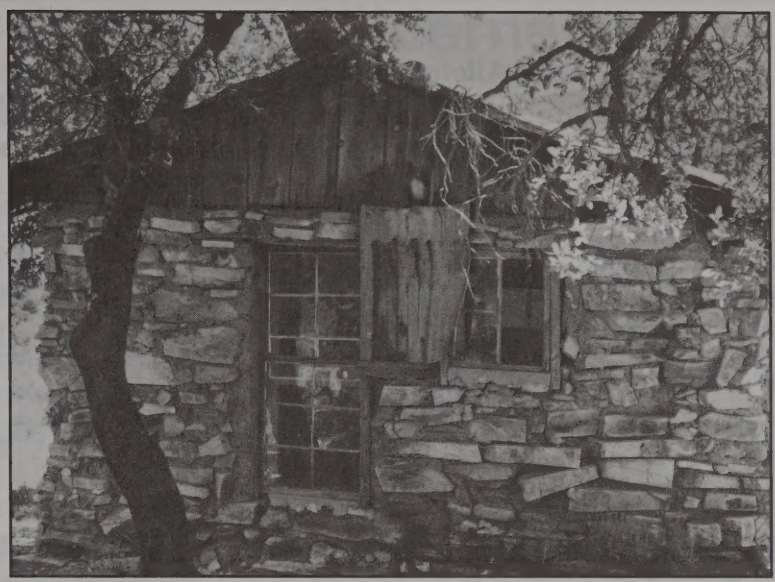
miles

LOCATION MAP

1994

Canyon Road. Several closed vehicle trails are used to a limited extent for hiking and horseback riding.

Permits for non-commercial visitor use are not required at this time and no special limits are imposed on party size or on length of stay. The District policy allows for no more than 14 days at one site. No special recreation permits for commercial use have been issued.



Historic cabin in Happy Camp Canyon.

Currently visitors requesting information on the wilderness are given a two page handout containing a map and other pertinent information about the wilderness.

Fire

No long term data have been kept on fires occurring specifically within the wilderness. There has been a low incidence of fires in the past twenty years, with a small acreage burned in each incident. Fire was a natural component in developing the vegetation in this area. Fires in this area would generally exhibit low rates of spread and low intensity.

In the past, smoke has not had an impact on air quality. Both the wilderness and the surrounding area are designated as Class II for air quality.

Fire management prior to development of this plan was suppression of all wildfires in the wilderness.

Cultural

Known cultural resources include several prehistoric sites consisting of small shelters under rock overhangs. The Dos Cabezas Mining District dates back to the late 19th century. Numerous abandoned mining sites are located throughout the area. Also, two cabins constructed in the early 1900s are found in the wilderness. The cabin in Tar Box Canyon is used by the local rancher for storage. The other cabin in Happy Camp Canyon is used to a limited extent by hunters. Evidence of human use including vehicle parts, metal pipe and fence materials is obvious around the cabin. It is likely that some of the sites are eligible for listing on the National Register of Historic Places.

Bands of Apaches are believed to have frequented the Dos Cabezas Wilderness but no definite sites of this occupation are recorded in BLM files. Traditional use of the wilderness for collection of acorns and medicinal plants was confirmed by an individual representing the elders of the San Carlos Apache Tribe.

Minerals

The wilderness was withdrawn from mineral entry and closed to mineral leasing and mineral materials disposal in 1990. No mining claims, mineral leases or mineral materials disposal sites are in the wilderness.

Table 2
Grazing Allotments In The Dos Cabezas Mountains Wilderness

Allotment	Wilderness Acres	Non Wilderness Acres	Wilderness AUMs	Non Wilderness AUMs
Rough Mountain	7,486	10,464	556	814
Happy Camp	2,071	320	186	30
Sheep Canyon	1,427	6,805	120	600
Ninemile	1,014	590	22	14
Totals	**11,998**	**18,179**	**884**	**1,458**

Livestock Grazing

The wilderness includes parts of four grazing allotments (Table 2) containing several developments (Appendix A and Map 3). Following are descriptions of livestock grazing management on these allotments:

Rough Mountain - An allotment management plan was signed and implemented in 1990. The grazing system consists of two units, each with three pastures. The cattle are split into the two units and rotated through the three pastures on a best pasture system. Cattle are moved to average 40 percent utilization of key species.

Happy Camp - The allotment management plan needs revision to reflect current management. Cattle are removed from the allotment for 3 - 4 months during the summer growing season to let the perennial grasses grow and seed out.

Sheep Canyon - The Sheep Canyon Allotment Management Plan was signed and implemented in 1986. Cattle are rotated through five pastures on a best pasture system. Cattle are moved to average 40 percent utilization of key species.

Ninemile - The allotment management plan needs revision to reflect current management. The permittee varies management from yearlong during years of high forage production to seasonal grazing during seasons of low forage production.

Administration

The wilderness is administered under authority and provisions of the Wilderness Act of 1964, the Federal Land Policy and Management Act of 1976, and the Arizona Desert Wilderness Act of 1990. Further guidance for management of wilderness is found in 43 CFR 8560 and Management of Designated Wilderness Areas, BLM Manual 8560.

The Safford District Law Enforcement Ranger has authority to enforce all laws and regulations pertinent to public lands. Law enforcement may also be handled by any appropriate state, county, or federal agency with federal law enforcement authority.

Signs are limited to wilderness boundaries along access routes and at previously used vehicular access points. Evidence of unauthorized vehicle use has been observed but number of occurrences are unknown.

Part II — National Wilderness Management Goals

The following four national policy goals from BLM manual 8561 provide guidance for wilderness management.

1. To provide for the long term protection and preservation of the area's wilderness character under a principle of nondegradation. The area's natural condition, opportunities for solitude, opportunities for primitive and unconfined types of recreation, and any ecological, geological, or other features of scientific, educational, scenic, or historical value present will be managed so that they will remain unimpaired.

2. To manage the wilderness area for the use and enjoyment of visitors in a manner that will leave the area unimpaired for future use and enjoyment as wilderness. The wilderness resource will be dominant in all management decisions where a choice must be made between preservation of wilderness character and visitor use.

3. To manage the area using the minimum tool, equipment, or structure necessary to successfully, safely, and economically accomplish the objective. The chosen tool, equipment, or structure should be the one that least degrades wilderness values temporarily or permanently. Management will seek to preserve spontaneity of use and as much freedom from regulation as possible.

4. To manage non-conforming but accepted uses permitted by the Wilderness Act and subsequent laws in a manner that will prevent unnecessary or undue degradation of the area's wilderness character. Non-conforming uses are the exception rather than the rule; therefore, emphasis is placed on maintaining wilderness character.

A wide elevation range allows for a variety of plant and animal life.

Part III — Issues

Issues Addressed in this Plan

1. Preservation of Wilderness Values including Naturalness, Outstanding Opportunities for Solitude and Primitive Recreation

All uses of wilderness are managed with the underlying principle that wilderness values will be protected. The following concerns are addressed:

- How will the wilderness boundary be identified?
- How will naturalness be restored in degraded areas?
- How will vehicular trespass be addressed?
- What existing human impacts will be removed?
- What fire suppression activities will be used to minimize impacts on naturalness?
- What will be done to maintain solitude?

2. Management of Vegetation

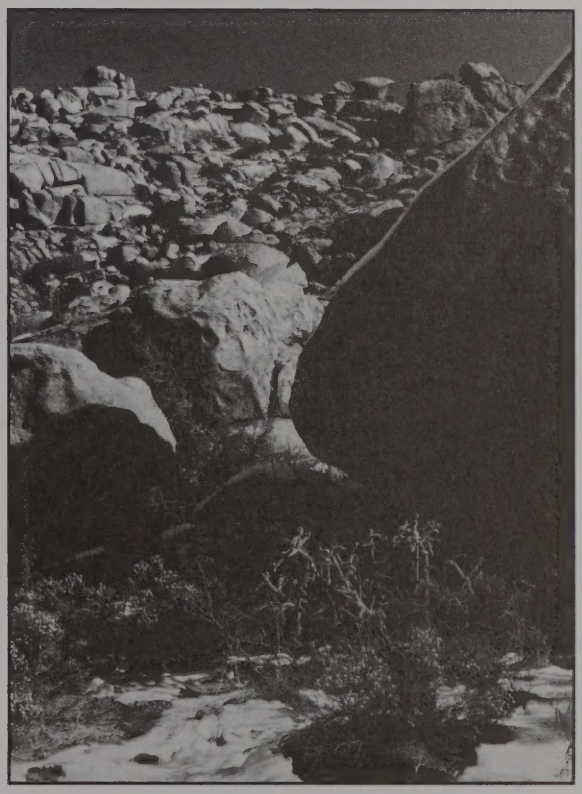
Many land uses affect vegetation. Decisions will address the following concerns:

- What is the desired condition of the plant communities?
- What actions are needed to achieve the desired conditions?
- How will fire shape vegetation communities?
- What baseline monitoring studies are necessary?

3. Recreation Developments and Visitor Services

Concerns were raised about what recreation development and visitor services should be provided. The plan will address the following concerns:

- What recreation developments, such as trails, trailheads, parking areas, or campsites are necessary?



Granite boulders and rock outcrops in the eastern portion of the wilderness.

- What visitor services should be provided?
- What public information should be provided?

4. Access

Access to the wilderness boundary crosses state and private land. This plan will address what will be done to gain legal access to the wilderness.

5. Livestock Management

Numerous range management activities, including maintenance of developments and vegetation monitoring, may affect wilderness values. The plan will address how existing developments will be maintained.

6. Wildlife Management

Wildlife management activities, including maintenance of developments and monitoring of wildlife populations, may affect wilderness values. The following concerns will be addressed:

- How will the visual impact from the abandoned, nonfunctional Tar Box Spring wildlife development be mitigated?
- How will the Government Peak Slickrock Catchment be maintained?
- How will wildlife populations be monitored?

7. Management of Cultural Resources

Cultural resources exist in the wilderness. This plan will address how the two cabins and other cultural resources will be allocated and managed.

Issues Resolved by Policy or Administrative Action

The following issues are resolved below and will not be addressed further in the plan.

1. Effects of Wilderness Designation on Livestock Grazing

The public asked if livestock grazing would be eliminated, reduced or increased due to wilderness designation. The Wilderness Act allows grazing to continue where established prior to designation. Adjustments in the number of livestock will be based on BLM range monitoring studies and allotment evaluations.

2. Animal Damage Control

The planning area is outside any identified animal damage control areas. If emergency control actions are needed, they can be authorized in a manner that will not impact the areas values.

3. Reintroduction of Indigenous Species

The Dos Cabezas Mountains are historic habitat for several indigenous species that were extirpated from the area. If, in the future, the Arizona Game and Fish Department finds that the area is suitable for reintroduction, this would be compatible with wilderness management. Details of where and how species would be released will be addressed on a case-by-case basis.

4. Hunting in Wilderness

A member of the public suggested that BLM encourage Arizona Game and Fish to ban hunting in wilderness. The Arizona Desert Wilderness Act states:

nothing...shall be construed as affecting the jurisdiction or responsibilities of the State of Arizona with respect to wildlife and fish on the public lands...

It would be inappropriate to ban hunting simply because an area is designated wilderness.

5. Outfitter and Guide Activities

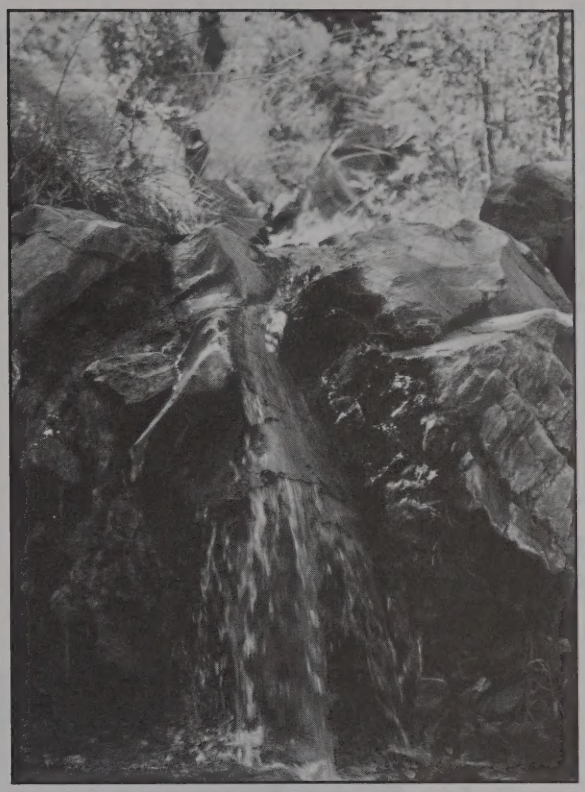
Outfitter and guide activities have caused no impacts in the area. This is not expected to change during the life of the plan. If an application for outfitting or guiding is received, the application would be processed using existing BLM procedures.

6. Recreation Use Fee

Several of the public suggested that the BLM charge recreation use fees and that the county get a portion of this fee. Since visitation is so low, administrative costs would exceed the amount collected in fees. Therefore a fee will not be charged.

7. Uses Outside the Wilderness Boundary

The Arizona Desert Wilderness Act states that there shall be no buffer zones. The fact that nonwilderness activities or uses can be seen or heard from within a wilderness shall not preclude such activities or uses up to the wilderness boundary.



Tar Box Canyon features flowing water about 9 months of the year.

8. Military Overflights

Military flight restrictions are addressed in the Arizona Desert Wilderness Act of 1990. The Act states:

Nothing in this title shall preclude low level overflights of military aircraft, the designation of new units of special airspace, or the use or establishment of military flight training routes over wilderness areas designated by this title.

The Safford District will continue to work with the military to minimize impacts to the wilderness.

9. New Livestock and Wildlife Developments

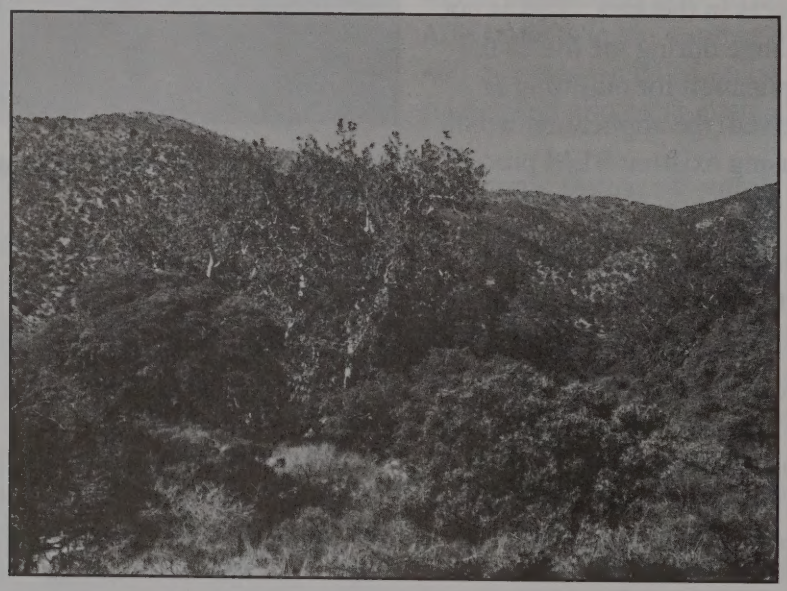
There are no new livestock or wildlife developments proposed in the Dos Cabezas Mountains Wilderness. Any developments proposed in the future would be considered through Plan Evaluation (Part V).

10. Cultural Resources

Cultural resources having scientific value are allocated to scientific use. Proposals for study will be authorized on a case by case basis guided by existing policy in BLM manual 8560.32 and subject to compliance with section 106 of the National Historic Preservation Act of 1966.

11. Threatened and Endangered Species

Suitable habitat for threatened and endangered species occurs in the wilderness. These species and any new listings of threatened or endangered plant or animal species will be managed in accordance with the Endangered Species Act of 1973 and BLM Manual 6840, 8560.34 and 8560.35.



An Arizona Sycamore in Happy Camp Canyon.

Part IV — Wilderness Management

Objective 1 Preservation of Wilderness Values

Maintain or enhance the wilderness values of naturalness, outstanding opportunities for solitude and primitive recreation, and special features in the wilderness by:

- allowing natural restoration on 1 mile of closed vehicle trails by the year 2000 in Happy Camp Canyon and around the Indian Bread Rocks picnic area.
- eliminating vehicle trespass by 1995.
- minimizing the impacts of fire suppression by 1995.
- minimizing low level aircraft use (below 2000 feet above ground level) by 1995.
- enhancing opportunities for primitive recreation while minimizing recreation developments within the wilderness by 2000.
- managing cultural resources to minimize human impacts while making them available for scientific research and recreational enjoyment throughout the life of the plan.

Rationale: Objective 1 address all four National Wilderness Management Goals and plan issues 1, 3, 4, 7 and part of issue 6.

Management Actions

1. Install and maintain wilderness boundary signs by 1995 at all accessible points of entry, with special emphasis on the Happy Camp Canyon and the Indian Bread Rocks areas. If signing is not adequate to eliminate unauthorized vehicle entry, install physical barriers outside the wilderness.

2. At a minimum, conduct monthly wilderness patrols. Boundary signs will be maintained as needed.

Rationale for actions 1 and 2: The combination of wilderness boundary identification and regular patrols will eliminate unauthorized vehicle use. Elimination of vehicle trespass will allow natural rehabilitation of vehicle trails. The intent of barriers is to prevent vehicles from entering the wilderness and is not expected to impact adjacent landowners.

3. Adopt the fire management techniques found in Appendix B.

4. In accordance with the Memorandum Of Understanding with Arizona Game and Fish Commission, the AGFD will conduct one annual low level big game species survey flight between December 1 and February 28. AGFD will attempt to schedule the survey flight to occur during a weekday, and will notify the Area Manager as soon as possible if additional survey flights are necessary.

Rationale: The wildlife operations as outlined will assure that necessary wildlife data is gathered to assure proper management with the least impact to the naturalness and solitude of the wilderness.

5. Maintain existing Tar Box and Upper Bear Spring trails using non-motorized and non-mechanical methods (Map 3).

6. No new recreation developments will be built in the wilderness.

Rationale for actions 5 and 6: The wilderness will be managed with an emphasis on undeveloped recreation opportunities. Existing trails are adequate to provide both recreation opportunities and administrative requirements. In addition, recreation use does not warrant new trails, camps or other recreation developments within the wilderness.

7. Develop a minimum trailhead at the Indian Bread Rocks picnic site, consisting of an information kiosk, visitor register, a restroom and parking for 5 cars by 1997.

8. Acquire legal public access along the Happy Camp Canyon and Mascot Canyon Roads by 2000.

Rationale: Legal access does not currently exist. Acquiring access along these two roads will ensure adequate access for both recreation and administrative use.

9. Cultural resources identified though reconnaissance inventory, will be evaluated and allocated annually during plan review. (Appendix C).

Rationale: Baseline data is needed to evaluate and allocate sites for use categories and determine monitoring requirements.

10. Discontinue use of Tar Box Cabin for storage by 1995. Cancel the cooperative agreement with the rancher.

Rationale: The rancher has indicated that he does not need to use the cabin in conjunction with ranching operations. Discontinuing use will ensure that this cabin is not degraded through that use.

Monitoring

1. Record unauthorized vehicle use and evaluate the effectiveness of current efforts to eliminate unauthorized vehicle use.

2. Establish photo points and photograph vehicle trails every other year to determine progress toward natural rehabilitation.

3. Visit selected cultural sites identified through inventory twice yearly to observe and photograph condition of sites to determine if deterioration is natural or man caused. Monitoring will begin in 1996.

4. Use visitor register information to estimate visitor use and evaluate effectiveness of management actions.

Objective 2 Management of Vegetation

Manage ecological condition and allow natural variability during the life of the plan as follows:

Ecological Site	Seral Stage	Acres
Volcanic Hills/ Woodland	Maintain in High	5,202
Volcanic Hills	Maintain in PNC	1,185
	Maintain in High	2,118
Granitic Hills	Maintain in High	2,079
	Improve Mid to High	1,324
Sand Bottom	Maintain in Mid	90

Rationale: This objective addresses National Wilderness Management Goals 1 and 4 and issue 2 of the plan.

High seral stage and potential natural community in these ecological sites provide adequate soil protection. Improvement in the Granitic Hills from mid to high seral stage will reduce shrub species and increase grasses. The subsequent reduction in shrubs will provide a plant community with increased species diversity to improve wilderness values. This plant community has experienced an increase of shrubs which are the result of historic overgrazing before the turn of the century. This one time burn will reduce shrubs and allow future naturally occurring fires to play their natural role in ecosystem maintenance.

The long term goal for the Sand Bottom site is improvement from mid seral stage to potential natural community. However, the current climatic conditions and slow rate of vegetation composition changes exhibited in semi-arid environments preclude vegetative change greater than that stated in Objective 2. The objective during the time frame of this plan is to improve the sand bottom site within the mid seral stage.

Springs are surrounded by riparian vegetation in proper functioning condition. The extent of riparian vegetation is too small and widely dispersed to manage separately from upland vegetation. As long as upland vegetation objectives are achieved, healthy riparian areas will be maintained.

In addition, the combination of desired plant communities discussed above provide a mix of habitat for diverse wildlife species.

These plant communities are affected by natural variability resulting from changes in weather, fire, and insects and disease. These natural processes will be allowed to occur as long as they are not threatening lives or property outside the wilderness.

Management Actions

1. Limit utilization to an average of no more than 40 percent of key species (sideoats grama) in key areas over a period of at least three years. Remove livestock at any time utilization levels on key forage species exceeds 60 percent.

Rationale: Average forage utilization levels of 40 percent or less on key species will assure maintenance and/or improvement of the ecological sites. Sideoats grama has been chosen as the key species on these grazing allotments due to its relative abundance and palatability to livestock. Sufficient seed sources will be produced to allow recruitment of new plants, increase in plant cover and maintenance of plant vigor. This management action will also provide quality habitat for indigenous wildlife populations.

Utilization of key species in key areas would average 40 percent. Over a three year period, utilization could vary from 20 percent (wet years) to 60 percent (dry years). Averages are used to allow for flexibility of livestock use due to variability of rainfall.

2. Use prescribed burning to change 1,000 acres of granitic hills from mid seral to high seral stage in 1995. An operational site specific burn plan will be prepared prior to the prescribed burn and a smoke permit will be obtained. Control lines will not be constructed, natural features will be used to confine the fire. Following prescribed burning the area will be evaluated to determine the length of rest from livestock grazing.

	Acceptable Prescription Range	
	Low	**High**
Temperature (Fahr.)	70	100
Relative Humidity (%)	10	25
Windspeed (MPH)	0	20

3. Allow prescribed natural ignition fires to burn within the following prescription:

	Acceptable Prescription Range	
	Low	**High**
Temperature (Fahr.)	50	105
Relative Humidity (%)	5	N/A
Windspeed (MPH)	0	20

Rationale for actions 2 and 3: Fire will provide for more plant diversity and density while achieving a natural mosaic of plant communities. Fire is a natural part of each ecological site.

Monitoring

1. One pace frequency transect in each ecological site will be read every three years to monitor changes in plant composition.

Rationale: Data derived from pace frequency transects have proven to be accurate indicators of vegetation change. This data helps determine the direction of vegetation change, particularly with regard to increase or decrease in perennial grasses. Two existing pace frequency transects are located in the Volcanic Hills site in Happy Camp Canyon. One pace frequency transect will be established in each of the three remaining ecological sites by 1996.

2. Map utilization zones annually for all allotments within the wilderness during the first three years of the plan to ensure utilization limits are not exceeded. Utilization mapping will then be conducted once every three

years if livestock management practices remain unchanged and objectives are being met. Changes in either parameter will require yearly utilization monitoring.

3. Photo trend plots and species composition studies will be established on prescribed natural fires and prescribed fires to monitor results of burns. Monitoring frequency will be coordinated to coincide with other established utilization and frequency studies.

Rationale: Photo trend plots and species composition studies on burned areas will be used to determine if ecological sites are moving toward stated vegetation management objectives.

4. Map ecological sites on the entire wilderness at 5 and 10 years after acceptance of the plan to determine current status and success of management actions.

Rationale: An ecological site inventory determines plant composition at a given point in time. Comparing that information with previous inventories indicates changes in ecological condition and progress toward objectives.

5. All prescribed fires, natural and management ignited, will be monitored daily to determine whether the fire remains in prescription.

Rationale: BLM policy requires the line officer responsible for executing the prescribed fire plan to certify that: (a) the fire is within prescription; (b) the fire will remain within the written prescription through the ensuing 24-hour period, given reasonably foreseeable weather conditions and fire behavior; and (c) adequate resources are available to suppress the fire should it exceed prescription.

Objective 3 Livestock and Wildlife Developments

Maintain existing essential livestock and wildlife developments while minimizing impacts to the areas wilderness values by:

- using non-motorized, non-mechanical equipment to inspect and maintain developments except Government Peak Slickrock catchment.
- using non-motorized, non-mechanical means to inspect Government Peak Slickrock catchment. Minimize the use of motorized and mechanical equipment to maintain or remove Government Peak Slickrock catchment.
- removing all unnecessary or abandoned developments.

Rationale: This objective addresses all 4 of the National Wilderness Management Goals. It also addresses Issues 5 and 6 of this plan.

Management Actions

1. Inspection and maintenance of all range developments using non-motorized and non-mechanical means will be added as a Term and Condition of grazing permits.

2. Inspect and evaluate need for Government Peak Slickrock catchment by July, 1995.

Rationale: The evaluation will determine if the springs in the area are adequate for wildlife needs on a yearlong basis or if the development remains necessary to supply water. In addition, if the development is necessary, it will be inspected to determine long and short term maintenance needs. If the evaluation determines that the development is necessary for wildlife management and maintenance is necessary, a helicopter could be used. If the evaluation determines that the development is not necessary for wildlife management, it could be removed using a helicopter. Since this action has the potential to directly affect wildlife management, AGFD will be involved in the inspection and evaluation.

3. Remove unnecessary or abandoned developments with concurrence of Arizona Game and Fish Department, including Tar Box Exclosure Fence, Tar Box Spring, Rough Mountain Trough and Bota Chiquita Spring developments using non-motorized, non-mechanical means by 1996.

Rationale: Springs in the area appear to be in proper functioning condition. This is evidenced by perennial water, carex and rushes present, and reproduction of riparian trees species occurring. The areas also have good cover of deergrass (an indicator of improving condition). These areas provide adequate water for wildlife and livestock. Livestock are not grazed in the areas of these springs during the growing season. Removal of these developments will improve naturalness with no impact to wildlife or livestock. These developments were built in the 1970's.

Indian Bread Rock Picnic area adjacent to the wilderness.

Part V — Plan Evaluation

The management plan is written to cover a period of 10 years. It will be reviewed annually prior to the budget cycle to:

1. determine if objectives are being met,

2. summarize and document the annual monitoring,

3. assess the need to change parts of the plan no longer valid or recommend and select new management actions (new actions or revisions of objectives will require plan amendment),

4. evaluate actions that have been completed and plan the following years actions, and

5. estimate annual costs.

In addition to the annual review a formal evaluation will be conducted after five years. This review will provide the BLM an opportunity to evaluate the monitoring data collected over the previous five years as well as the actions that have been completed. The BLM will also have the opportunity to identify new issues or concerns that may have developed. If revisions are needed, the plan would be amended.

Part VI — Plan Implementation and Cost Estimates

This section outlines time frames and cost estimates for the planned actions. The actions are grouped into special projects and recurring projects. The order of implementing planned actions may change as funding changes.

Special Projects	Material Cost/Workmonth	Time Frame
Develop Indian Bread Rocks trailhead	$8,000 3 WM	FY 97
Access	2 WM	FY 00
Prescribed Burn	$1,000 1 WM	FY 96
Inspect and evaluate need for Government Peak catchment	1 WM	FY 95
Remove Tar Box Exclosure Fence	1 WM	FY 96
Remove Tar Box Spring development	$1,000 1 WM	FY 96
Remove Bota Chiquita Spring dvlpment	$1,000	FY 96
Remove Rough Mountain Trough	minimal *	FY 97
Recurring Projects	**annual material cost/work month**	**Frequency**
Wilderness Boundary Signs	minimal	as needed
Patrols	1 WM	monthly
Maintain trails	minimal	as needed
Cultural Inventory	$1,000 2 WM	annually
Vehicle trail photo points	minimal	every 2 years
Monitor cultural sites	minimal	2 times per year
Monitor ecological sites	minimal	every 3 years
Map utilization	1 WM	variable
Map ecological sites	1 WM	every 5 years
Prescribed natural fire	$2,000	each occurence
Plan evaluation	minimal	annually

*Less than $1,000 and 1 workmonth.

Part VI — Plan Implementation and Cost Estimates

This section outlines time frames and cost estimates for the planned actions. The actions are grouped into special projects and recurring projects. The order of implementing planned actions may change as funding changes.

Part VII — Public Involvement

BLM's public involvement process utilized the public at different planning stages in the development of this wilderness management plan. This included scoping of management issues and review of the draft management plan.

Two public meetings were held to help identify what the public perceived as management issues that needed to be addressed in the wilderness management plan. One public meeting was held on December 9, 1991 in Tucson and the second meeting was December 10, 1991 in Safford. Written comments were also accepted from the public for a 30 day period following the public meetings.

In addition to the public meetings, BLM has worked in coordination with the AGFD and local ranchers regarding wildlife and livestock issues in the wilderness. Also a meeting was held with individuals representing the elders and Forestry Department of the San Carlos Apache Tribe.

The Draft Dos Cabezas Mountains Wilderness Management Plan and Environmental Assessment was distributed to over 500 interested individuals, groups, and governmental organizations by mail on October 17, 1994. During a 45-day public comment period following distribution of the Draft Plan, the BLM received a total of 23 letters.

The comment letters and responses have been made part of this document and are included in this section. Based on comments received several minor changes were made to the plan. All changes made to the plan are described in this section as well.

1

THE STATE OF ARIZONA

GAME & FISH DEPARTMENT

2221 West Greenway Road, Phoenix, Arizona 85023-4399 (602) 942-3000

Governor
Fife Symington

Commissioners:
Chairman Elizabeth T. Woodin, Tucson
Arthur Porter, Phoenix
Nonie Johnson, Snowflake
Michael M. Golightly, Flagstaff
Herb Guenther, Tucna

Director
Duane L. Shroufe

Deputy Director
Thomas W. Spalding

RECEIVED
BLM SAFFORD DISTRICT
DEC 06 1994
SAFFORD, ARIZONA

December 2, 1994

Mr. Tom Schnell
Outdoor Recreation Planner
Bureau of Land Management
711 14th Avenue
Safford, Arizona 85546

Re: Draft Dos Cabezas Mountains Wilderness Management Plan (DWMP) and Environmental Assessment (DEA)

Dear Mr. Schnell:

The Arizona Game and Fish Department (Department) has reviewed the above-referenced documents, dated September 1994, and the following comments are provided.

General Comments

1-1 The Department is concerned that portions of Objective 2, Management of Vegetation (Page 20), do not appear to satisfy the requirements stated in Appendix 1 of the Memorandum of Understanding (MOU) between the Arizona Game and Fish Commission and the Bureau of Land Management (BLM). Appendix Page 1-9, item 14, Management of Fire, states:

> "Prescribed fires ignited by man may be permitted to reduce unnatural buildup of fuels only if necessary to meet objectives (a) and (b) above. Although additional benefits may result from man-ignited prescribed fire, vegetative manipulation will not be used to justify such fires."

The two objectives mentioned (a and b) relate to lightning-caused fires being able to play a natural ecological role, and to reducing the risks and consequences of wildfire. Although the Department recognizes the potential for prescribed fires to improve wildlife habitat in some situations, Appendix 1 of the MOU establishes specific circumstances in which man-ignited fires are acceptable in Wilderness Areas. The rationale for the prescribed burning of 1,000 acres of granitic hills does not coincide with these circumstances. This issue apparently has not been resolved as a result of Department input provided for the Draft Peloncillo Mountains Wilderness Management Plan. Because of this, the Department respectfully requests that this issue be reviewed by the BLM, and that a response be provided to the Department prior to finalization of Dos Cabezas Mountains DWMP.

Specific Comments

Page 1, Access

The Department concurs that additional legal access would be beneficial to users of the Wilderness Area. In addition, we recommend that existing access be maintained.

Page 4, Vegetation

1-2 Although the Department understands the BLM's reasoning for not classifying riparian areas as a separate ecological site, we are concerned that the unique vegetation characteristics of riparian areas may not be adequately recognized in the DWMP. As stated below in our comments regarding Page 21, monitoring efforts to ensure protection of this habitat resource are believed to be inadequate as currently proposed.

Page 16, item 3, Reintroduction of Gould's Turkey

1-3 The last sentence states that "If the best release site is in the wilderness, the release would be done with non-mechanical, non-motorized methods." Based on Article III of the MOU, Wilderness Constraints, the Department does not believe that it is appropriate for the DWMP to include such a restriction at this point in time. Instead, and in accordance with the MOU, we believe that the DWMP should provide for the Wilderness Manager to make such a decision if the need arises.

Page 19, item 4

1-4 Variations in weather conditions, aircraft and personnel availability, or big game distribution sometime require that aerial surveys be conducted on weekdays or for more than one day. Because of this, and as per the MOU, the Department recommends that the words "on a weekday" be deleted from the subject sentence, and that a second sentence be added to read:

> "AGFD will attempt to schedule the survey flight to occur during a weekday, and will notify the Area Manager as soon as possible if additional survey flights are necessary."

A similar change should be made to the DEA (Page 40, Item 4).

Page 21, right column, first paragraph

1-5 The Department does not concur with the second sentence of this paragraph. Although the condition of adjacent upland habitat may give some indication of the health of riparian areas, it certainly does not provide a conclusive qualitative determination. Because riparian areas are often preferred by livestock, these habitats can

be severely impacted prior to any significant warning signs from upland habitat monitoring alone. The Department recommends that the BLM establish and monitor at least one transect in a riparian area with surface water for each allotment.

Page 24, item 2

1-6 The Department believes that removal of the Government Peak Slickrock catchment has the potential to directly affect wildlife management in the Wilderness Area. Prior to any further consideration of removal, the Department respectfully requests a meeting with the BLM to evaluate the current status and feasibility of removing this catchment and the Tar Box Canyon Spring improvement. Similarly, the Department believes that removal of other water developments (item 3) should only occur after reaching a consensus among our agencies to do so.

Page 24, right column

1-7 The rationale provided for item 3 states that springs in the area of the subject developments are in "proper functioning condition". It is not immediately clear what data or criteria has been used to reach this conclusion.

Page 41, Alternative B

1-8 Because the BLM has no authority to regulate airspace over the Wilderness Area, this Alternative would not affect whether wildlife survey flights continue to occur. Under Alternative B, the Department would continue to conduct such operations. We recommend that the reference to wildlife census flights be deleted from the last sentence of the Alternative B description. In addition, the last sentence on Page 42 referring to aerial monitoring and censuses should be deleted for the same reasons.

Thank you for the opportunity to comment on this DWMP and DEA. If you have any questions, or to arrange for the meeting requested above, please contact me at 789-3605.

Sincerely,

Ron Christofferson

Ron Christofferson
Project Evaluation Coordinator
Habitat Branch

RAC:rc

cc: Gerry Perry, Regional Supervisor, Region V, Tucson
Ruth Valencia, Program Manager, Nongame Ecosystems
Richard Rico, Chief, Development Branch

AGFD# 10-24-94(05)

2

Box 366
Bowie, AZ 85605
Oct. 30, 1994

RECEIVED
BLM SAFFORD DISTRICT
NOV 03 1994
SAFFORD, ARIZONA

Bureau of Land Management
Attn: Tom Schnell
711 14th Ave.
Safford, AZ 85546

Dear Mr. Schnell:

Thanks for sending a copy of your draft Dos Cabezas Mts. Wilderness Mgt. Plan and Enviromental Assessment. My comments are few. I live just a couple miles due east of your Indian Bread Rocks section of the wilderness and have hiked them on many occasions, thus they remain my special interest.

P. 15-16 Recreation Development and Visitor Services. As a former National Park Service interpreter (ret. Ft. Bowie NHS, 1987), I see a need for a booklet, perhaps of some 20-30 pages that will interpret the physical, natural and human story of the wilderness. Some time back, I sent to your office a few wildlife observations, some historical notes and possible place names. These did not include the background of the two cabins.

P. 17 Maybe it's my Park Service coloring, but I am at a loss to understand Game and Fish's insistance on allowing hunting in a federal wilderness. The state's hunting lobby is doubtless too strong to change this clause. Few of us would venture into that wilderness during hunting season, red clothing or not.

P. 19 Objective one Preservation of Wilderness Values reads very well, however, the fith item, "enhancing opportunities for
2-1 primitive recreation while minimizing recreation developments..." is unclear. Presumably, they might be hiking, wildlife pursuits and other miscl. natural history?

P. 20 I suggest utmost caution with trails and trail heads in the Indian Breadrocks area. As you know, the Indian Bread Rock Picnic area (also Masonic picnic area) is a hot bed for
2-2 vandalism. For instance, a trail head at this site could lead to or near a major pictograph site above the picnic area. Giving the drinking/vandalism that occurs at this picnic area, would not such behavior be carried up the trail and into the wildnerness? I've noticed cans and bottles are appearing more frequently in the canyon's (does it have a name?) pools.

I've located at least four glyph sites in these rocks which I'll be glad to show you if you wish. Also, I doubt that a foot trail through the outcropping would serve anything, if, in fact, one could be built, due to the amount of rock surface.

2-3 Back to p. 11 "Historic use of the wilderness by Native Americans is unknown." Cochise College rock art instructor Jane Kolber and her classes have recorded these glyphs, however, I am unsure if she forwarded them to your office. Also, historic records (Sweeney, Cochise and local lore suggest the area to have been a sometime campsite of Cochise's band. Also, pot sherds found in the area are probably known to your archeologist. Other historic presence (1872), I have noted to you earlier.

2-4 A splendid management plan, it seems; please advise if I might help somewhere.

Sincerely,

Bill Hoy

Bill Hoy

3

Bureau of Land Management
Safford AZ 85546

Oct 29 1994
Portal AZ 85632

Reply To: 1210 (045)
Subject: Oppose

I oppose this Dos Cabezas Mountain Wilderness management Plan. I am
3-1 against any and all Wilderness management Plans especially Where NO wilderness Characteristic exist and definitely NO Solitude exist.

Just a few miles north of this Wilderness area is a major railroad line Probable the busiest railroad in the United States. There is a major highway I-10 with 100,000 Semi trucks Per month Plus untold number of Cars (vehicles) Per day. There is mining and tele-communication activity on Dos Cabezas Peak area. In the Vicinity is farming activity Crop dusting Planes and all Kind of Army Helicoptors and air Patrol etc.

next Page

This Dos Cabezas Mtn area of 12,000 acres located in the middle of noise is too Small to be managed as a Wilderness area.

Bureau of Land Management best management Plan for this Dos Cabezas Mtn is Construct a recreation road to its Center. Then Construct a 100 Unit Campground with many trails. Also Construct 25 Spaces for large recreation Vehicle with full hook up facilities.

Sincerely
Pete Rawdon
PO Box 117
Portal AZ 85632

Copies sent
Civish = BLM
Saline = BLM
Power = FS

RECEIVED
BUREAU OF LAND MANAGEMENT
NOV 03 1994
SAFFORD, ARIZONA

	ACTION	INFO	INITIAL	DATE
DIST. MGR.				
EXT. AFFAIRS				
ASSOC. DM				
RENEW. RES. ADVISOR				
NON-RENEW. RES. ADVISOR				
PLANNING				
ADMIN				
OPERATIONS				
OLA				
SAN SIMON				
TUCSON CO				
SAN PEDRO				
FILE				

4

October 27, 1994

Bureau of Land Management
Attention: Tom Schnell
711 14th Avenue
Safford, AZ 85546

Ref: Draft Dos Cabezas Mountains Wilderness Management Plan
and Environmental Assessment

Dear Sir:

I compliment you on the referenced EA and Management Plan. I basically support your Proposed Plan but have a couple of suggestions/comments. I was the "Adoptor" for this wilderness study area representing the Arizona Wilderness Coalition and appreciate the fact you incorporated my suggestions for boundary changes back in the early '80s.

On page 11 under the CULTURAL heading you state "Historic or current use of the wilderness by Native Americans is unknown." I have been unable to locate a reference in a book on Apache history that states the Ninemile area was the area where Geronimo
4-1 kept his band for several months while Ft Bowie was totally unaware of their presence only a few miles away. I will keep looking for that reference and will forward it if I find it. Bill Hoy, the former ranger at Ft. Bowie led me to that reference many years ago.

I do think the Arizona Fish and Game Department should be encouraged to reintroduce Gould's Turkeys to the area.

I do support Animal Damage Control being discouraged from any operations in the Dos Cabezas. It has too many important wildlife values for them to come in with their typically non-selective trapping and poisons. As an ex-trapper I am very aware of how non-selective dryland trapping is.

One of the major concerns I have with your EA and Plan is that you don't address riparian mangement specifically. Even though
4-2 the areas are small, they are VERY important to wildlife. I do believe cattle are having some potential long term impacts and they should be excluded from the ripariian areas.

On your Management Action number 1 on page 21. You state "Limit utilization to an average of no more than 40 percent of key species in key areas..." You also use the 40% limit elsewhere
4-3 in the EA. In the very next sentence you state " Remove livestock at any time utilization levels on key forage species EXCEEDS 60 percent." Wildlife values are seriously impacted over 40% and that should be adhered to strictly. Some quail species are impacted over 20% utilization. Approaching or exceeding 60% is unacceptable.

4-4 I would encourage you to secure legal access into Happy Camp Canyon and Mascot Canyon Roads before 2000 if possible. Public access to Ninemile and Sheep Canyons would also be advantagious if possible.

Again thanks for your good work on the EA and Plan and I would appreciate consideration of the above for the Final.

Sincerely,

Jim Notestine

Jim Notestine

P.O. Box 461
Sonoita, AZ 85637

5

Bear Spring Ranch
Box 425
Bowie, AZ 85605
Oct. 31, 1994

BLM: re Dos Cabezas:

Access is everything. Before the start of
5-1 Happy Camp Canyon is the "Goat Farm"
road - this road leads to some of
the best hiking and recreation in all
Southeast Arizona. The rock formations
are unique; but a rancher has
been allowed to lock a gate across
the road. Local people have used this
road for at least the fifteen years
that I have and long before.
The Mascot Mine road is similar;
I've driven up it several times
and hiked it a number of times.
Government agencies lost it by
a half-hearted effort several
years ago.

I'm willing to help see that
these accesses are open, but
the impetus must come from
your office.

Without good access, what's the
point of all your work on
wilderness?

Regards,
Kenneth Cooper

RECEIVED
BLM SAFFORD DISTRICT
NOV 03 1994
SAFFORD, ARIZONA

6

P.O. Box 403
Bowie, AZ 85605
October 21, 1994

Bureau of Land Management
Attention: Tom Schnell
711 14th Avenue
Safford, AZ 85546

Gentlemen:

I would like to make two observations about the Dos Cabazas wilderness plan.

Although the best access, especially to the higher elevations, would be by the Mascot Mine Road this road has been closed by a court order obtained by Keith Klump. It is my understanding that Mr. Klump gave as his reason to the court that he did not want to be liable for a[illegible] neither he nor the court knew that he was protected from such liability by Arizona law. A.R.S. 33-1551 says:

A. An owner, lessee or occupant of premises does not:

1. Owe any duty to a recreational user to keep the premises safe for such use.

3. Incur any liability for any injury to persons or property caused by any act of a recreational user.

Therefore, it seems to me that the court order was in error and should be set aside.

My second observation refers to the statement on page 1, ".. there is no legal vehicular access to the wilderness". Such access does exist at the Breadrocks picnic site. While there may be no
6-1 absolute legal access in the sense that some private owner may cut off access to the Breadrocks, a really far-fetched possibility, in practice the access does exist. The statement that it does not exist may discourage people from using the wilderness.

Yours sincerely

Sidney Brooks

Sidney Brooks

RECEIVED
BUREAU OF LAND MANAGEMENT
OCT 24 1994

7

November 14,1994
P.O. Box 694
Sierra Vista, AZ 85636

Tom Schnell
Bureau of Land Management
711 14th Avenue
Safford, AZ 85546

RECEIVED
BLM SAFFORD DISTRICT
NOV 18 1994
SAFFORD, ARIZONA

Dear Mr. Schnell:

The preeminent weakness of your Dos Cabezas Mountains Wilderness Management Plan is grazing. If I read your charts correctly 100% of this "wilderness" is grazed. This is an oxymoronic concept. There cannot be wilderness and grazing at the same time. The oligarchic collaboration of the federal government(in this case the BLM) and ranchers is offensive to me. 425 million people own our public lands and yet a mere relative few are allowed to defile them. Of course, ranchers are conveniently protected by the Wilderness Act and the Arizona Desert Wilderness Act. Hopefully, someday enough people will amass enough power and influence to undermine this egregious and destructive assault on our public lands.

7-1 Onward. I suggest not maintaining Tar Box and Upper Bear Springs trails. If used enough they will maintain themselves. If they die out all the better. I know these areas and the terrain is open enough to get around without trails.

7-2 Physical barriers to unauthorized vehicle traffic is a good idea to initiate immediately. The damage and havoc rendered by only one insensitive slob could create enough damage to the land to last years. Why invite it with no barriers?

7-3 I oppose minimum trailhead development at Indian Bread Rocks. The more development the more people, the more garbage, vandalism, etc.

Congratulations on the discontinuation of Tar Box Cabin for storage.

Yes, remove unnecessary or abandoned developments.Please do not develop anything else.

Ban outfitter and guide acitvity now. It will be much easier to do while there is little or no such activity in the wilderness.

(over)

Low level overflights should be resisted. The noise and sight of this traffic is offensive and negatively impactful to solitude.

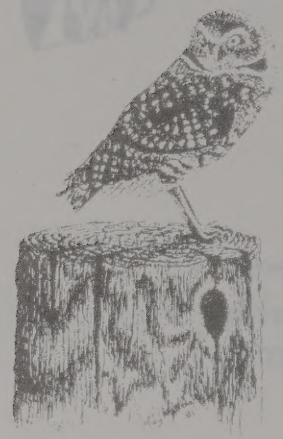
I advocate Alternative B--Minimum Human Impact.

Thank you for your consideration of my suggestions, Mr. Schnell. I would appreciate being advised of any public hearings about any BLM management plan activities.

Sincerely,

T. Lengerich

Tim Lengerich



8

ARIZONA DESERT BIGHORN SHEEP SOCIETY, INC.
P.O. Drawer 7545 • Phoenix, Arizona 85011
(602) 912-5300 • FAX (602) 957-4828

RECEIVED
BLM SAFFORD DISTRICT
NOV 14 1994
SAFFORD, ARIZONA

November 10, 1994

Tom Schnell
Safford District
Bureau of Land Management
711 14th Street
Safford, AZ 85546

Re: Draft Dos Cabezas Mountains Wilderness Management Plan and Environmental Assessment (EA-AZ-040-04-28).

Dear Mr. Schnell:

The Arizona Desert Bighorn Sheep Society, Inc. (ADBSS) reviewed the above referenced document and offers the following comments as part of the official public record.

ADBSS finds this document to be logical, reasonable and reflecting common sense on the part of the preparers. Since there are no desert bighorn sheep and no bighorn sheep habitat in the Dos Cabezas Wilderness Area, we do not have a position to take regarding proposed or alternative management actions.

Please keep us informed of any future planning efforts in the Safford District which may impact desert bighorn sheep.

Sincerely,

Richard Robles

Richard Robles, President
Arizona Desert Bighorn Sheep Society, Inc.

9

Nov. 14, 1994

RECEIVED
BUREAU OF LAND MANAGEMENT
NOV 17 1994
SAFFORD DISTRICT

BLM
Mr. Tom Schnell
711 14th Ave.
Safford, Az. 85546

Mr Schnell;

RE: 8560(045) Wilderness Management Plan of Dos Cabezas Mountains

9-1 It is felt that alternative A (NO ACTION) is the only reasonable action. As we already have some 40 BLM controlled wilderness areas, 32 by USFS, 8 by NPS and 20 or 25 Military or Indian locked-up areas in this state, it is time to say NO MORE. Aside from the initial cost and continued maintenance fees, now you want to add another 12,000 acres, to be run, regulated, patrolled and restricted from multiple use all at taxpayers expense. The majority of those taxpayers will be locked out.

The main responsibility of the BLM is to provide balanced management of public lands based upon the principles of multiple use. This draft purposes to eliminate all but a very few of the population.
How many wilderness areas have already eliminated mining, timber use, true access to all who desire it, including ranchers? On page 7, you have planted the first seed of future action with "the site could deteriorate from over grazing" and then in the purposed action #11 "limit utilization --remove livestock at anytime"". This is becoming a trite and repeatedly used tool for both the BLM and USFS to eliminate grazing. Next will be to stop hunting, which is usually the next step.
Of course we should not forget the use of the ESA to shut down the whole area off from everyone. I'm sure that besides the beautiful collared lizard or the occasional sighting of the peregrine falcon will give justification for allowing it to become another sterile "human prohibited" area or a "save it forever" section of our state.

With less than 14% of this state private land and all the rest so very restricted to the "look but don't touch" approach, I say again NO MORE.

Please put me on your mailing list for any future plans or outcome on this issue.

Maxine Hayes

Maxine M. Hayes
P.O. BOX 342
Yarnell, Az 85362

10

November 14, 1994

BLM
Mr. Tom Schell
711 14th Ave.
Safford, Az 85546

Mr. Schnell;
RE: 8560 (o45) Draft Wilderness Management Plan ~~Of Dos Cabezas~~ Mountains

We believe alternative A-(NO ACTION) would be in everyones' best interest.

Your estimates on this shows $11,000. plus, for your project, which the taxpayers can't handle.(Our national debt already exceeds 4½ trillion.)

10-1 The old cabins and water developments are a part of our history. Preserve them yes, cut off access to them-no. The same as old mines, old trails,etc. help serve to remind us of how our forefathers worked and fought for freedom and rights in these out of the way places.This area is part of our public domain and should remain so, as it has for many generations.

My wife's grandparents came to Arizona in 1868 with a herd of cattle;my ancestors came to the New Mexico territory (now Ariz.) in the late 1700s or early 1800s. And now you continue to want to lock us out of all of the old roads in these wilderness (desert) areas, that we have enjoyed all of our lives. This also discriminates against(again) the seniors, the handicapped or those who have several small children, as well as the hunters and long time residents of the area.

The draft talks about the trauma to animals from vehicles. The is not true. In all of our small towns, deer, quial, coyotes and smaller animals have become almost tame; if they do run away it is only to the next pasture of over the next knoll.

The draft also claims that tire tracks on the old roads cause problems to the elite back-packers who want to walk on those roads. Why are they on the roads??? All they would have to do is get off the roads and enjoy the true wilderness as we have done in the past.

10-2 This project does not take into consideration the economy, customs or culture of the people of the county or state.

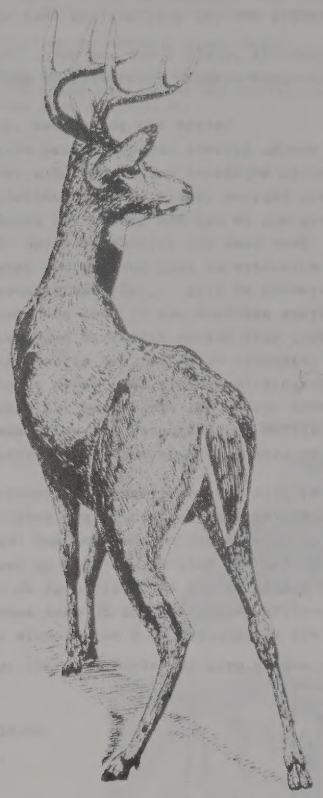
Again we strongly feel that NO ACTION should be taken on this project.

Fred J. Towne 11/16/94
Fred J. Towne

Alta Rose Towne
Alta Rose Towne 11-15-94

Members of :
Farm Bureau
Yavapai Cattle Growers
Yavapai Property Rights Coalition
People for the West
Weaver Mining District

H.C. 68 Box 95
Kirkland, Az.
86332



11

RECEIVED
BLM SAFFORD DISTRICT
NOV 14 1994
SAFFORD, ARIZONA

November 6, 1994

Bureau of Land Management
Attention: Tom Schnell
711 14th Avenue
Safford, AZ 85546

Dear Mr. Schnell:

I support most of the Dos Cabezas Mountains Wilderness Management Plan Proposed Alternative. But I have two major objections and one minor suggestion.

11-1 (1) On page 16, under "Issues Resolved by Policy or Administrative Action", matters that are already under the jurisdiction of existing policy are outlined. However, the Plan's responses to two of these issues are inconsistent. In the case of "Military Overflights", the Arizona Desert Wilderness Act of 1990 prohibits the precluding of "low level overflights of military aircraft". The Plan's response to this constraint is that "the Safford District will continue to work with the military to minimize impacts to the Wilderness". On page 19 this intention is reiterated: "minimizing low level aircraft use (below 2000 feet above ground level) by 1995". So even though this issue is supposedly "resolved by policy or administrative action" you intend to work to improve the situation. Very commendable. However, when the Arizona Wilderness Act also ostensibly ties your hands on the issue of hunting, the response is a verbal shrug: "It would be inappropriate to ban hunting simply because an area is designated wilderness". This is unsatisfactory. You are willing to work toward eliminating overflights, yet there are no promises to work with the State in an effort to eventually ban hunting, which certainly has no place in a wilderness area.

The adoption of the non-motorized, non-mechanical policy in Wildernesses is based on the consensus that the sight, sound, and smell of such equipment is irritating in the extreme and detrimental to a natural experience. Gunfire definitely falls into this category. I find the sound of gunshots to be far more offensive than any military jet or even a dirt bike. And the ever-real possibility of being shot at any moment, yes, believe it or not, does tend to detract from my wilderness experience.

To really promote wilderness values and a return to a natural environment, hunting should be banned, and natural predators such as wolves and mountain lions be reintroduced. The annual big "game" species survey flight should be eliminated, the money and manpower from this operation rechanneled into enforcing the non-hunting policy and protecting the predators from trigger-happy ranchers. Let nature find its own balance, as it has done so admirably for millions of years.

11-2 (2) On page 24 of the Plan, it states: "Springs . . . are surrounded by riparian vegetation and provide adequate year long water for wildlife and livestock". It was an unpleasant shock to learn that livestock are allowed in riparian areas. The damage cattle can do to these delicate ecosystems is well documented. They destroy vegetation, destabilize banks, and foul water. According to Lynn Jacobs' book, Waste of the West: " . . . livestock hooves annually churn springs, seeps, and other wet areas into mush, over time causing subsurface changes that physically block outflows. In many cases, trampling spreads water thinly into multitudes of hoof holes, dissipating flow and allowing water to become stagnant, reducing its availability and presenting health hazards to native animals".

To claim that one of the National Wilderness policy goals is "to provide for the long term protection and preservation of the area's wilderness character under a principle of nondegradation" while continuing to allow livestock grazing is a glaring nonsequitur and could be described as laughable were the consequences of such a contradiction not so tragic.

I realize that, at this time, there is no way the powerful minorities of hunters and ranchers are going to reliquish their selfish strangleholds on what's left of the natural environment. But I must protest in spite of that knowledge, and insist that hunting and grazing have no place in any area still healthy enough to be called a wilderness.

11-3 (3) On page 19 the Plan states: "If signing is not adequate to eliminate unauthorized vehicle entry, install physical barriers outside the wilderness". I suggest that you forgo the "wait and see" period and proceed directly to installing physical barriers. It has been my experience that wherever it is remotely possible for a car or truck to go, there will, without exception, be an ignoramus behind a wheel who will go there. The damage a motorized vehicle can do in an arid environment is nothing to take chances with.

In at least paying lip service to "wilderness values", and by prohibiting a few of the lesser destructive elements (although allowing the major ones to continue), I would say that the "management" of public lands is heading in the right direction. But it is not heading there nearly fast enough to keep pace with the relentless juggernaut of wholesale destruction that is obliterating the wild.

The first priority in the administration of any public land should be given to the original and rightful inhabitants of the area--the native flora and fauna. By this proper criterion, the best alternative covered in the Management Plan is Alternative B. Minimum human impact is always the best choice. An acceptable plan would boil down to: Do what can be done to restore the area to its pre-white human condition, then--LEAVE IT ALONE!

Sincerely,

Joanne Cockerill

Joanne Cockerill
Bisbee, Arizona

12

TUCSON
AUDUBON
SOCIETY

Audubon Nature Shop

300 E. University
#120
Tucson, Arizona
85705

602/629/0510

conservation
education
recreation

RECEIVED
BLM SAFFORD DISTRICT

NOV 22 1994

SAFFORD, ARIZONA

November 21, 1994

Bureau of Land Management
711 14th Avenue
Safford, Arizona 85546

Attention: Tom Schnell

Dear Sir:

Tucson Audubon Society has reviewed the Draft Wilderness management Plan for the dos Cabezas Mountains Wilderness. In general we find the document to well thought-out. If the proposed monitoring can be addressed as identified in the plan, the adequacy of the Plan will become clear in a few years.

We point out that the 40% utilization limitation rate based on side-oats gramma is a good management goal, but achievement of this will require conscientious monitoring and, perhaps, tough administrative decisions. It remains to be seen whether or not this admirable standard will in fact be implement. The use of pace frequency transects and repeat photography will be valuable tools in evaluating the management Plan as well. It is our hope that these will be carried out as outlined in the Draft Plan.

Thank you for a good job.

Sincerely,

David Yetman
Executive Director

13

ARIZONA
Department of Commerce

Fife Symington
Governor of Arizona

Sara Goertzen
Director

RECEIVED
BLM SAFFORD DISTRICT

NOV 28 1994

SAFFORD, ARIZONA

MEMORANDUM

TO : DOI, Bureau of Land Management

FROM : ARIZONA STATE CLEARINGHOUSE

DATE : November 23, 1994

RE : Bureau of Land Management
Draft Wilderness Mgt Plan
for the Dos Cabezas Mountains Wilderness

SAI NO: AZ 941021800069

This memorandum is in response to the above project submitted to the Arizona State Clearinghouse for review.

The project has been reviewed pursuant to the Executive Order 12372 by certain Arizona State officials and Regional Councils of Government.

The project is supported as written. Any comments, received within the 60 day comment period, will be directed to the federal agency with a copy to the applicant.

Manager Arizona State Clearinghouse

cc: Arizona State Clearinghouse
Applicant

3800 North Central Avenue, Suite 1500, Phoenix, Arizona 85012, (602) 280-1300, TDD: (602) 280-1301, Fax: (602) 280-1305

14

Dear Mr. Schnell; -11/94

Thank you for the opportunity to comment on the EA & Wilderness plan for Dos Cabezas Mountains.

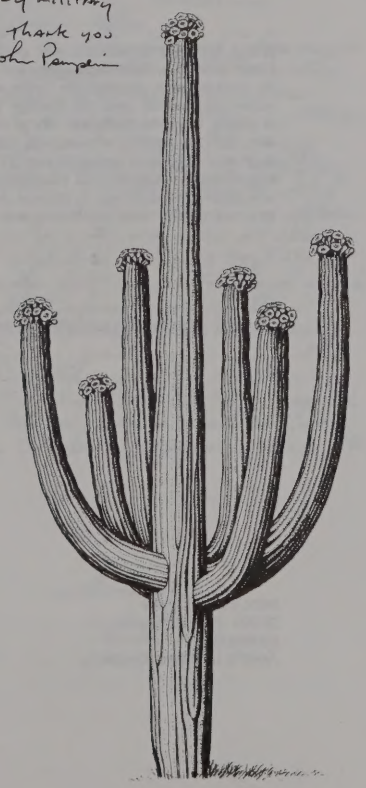
After reviewing the Plan, I feel that the proposed Action is the appropriate alternative for this area.

Though I don't favor grazing in Wilderness, I realize that this is sin we have to live with for now.

I hope that any low level flights by military Aircraft can be eliminated.

Thank you
John Pangelin

RECEIVED
BLM SAFFORD DISTRICT
NOV 14 1994
SAFFORD, ARIZONA



15

Chiricahua Regional Council
Star Route # 74
Portal, Arizona 85632

November 28, 1994

Bureau of Land Management
Attn: Tom Schnell
711 14th Ave.
Safford, Az. 85546

Dear Mr. Schnell:

The Chiricahua Regional Council has reviewed the Dos Cabezas Mountains Wilderness Management Plan and Environmental Assessment.

15-1 We are in substantial agreement with the Management Plan and Environmental Assessment, but are opposed to establishing either a trail or a trailhead in the Indian Bread Rocks area. That area is frequently used by young people for parties and drinking. Vandalism is common there. It would be impossible for the BLM to protect the pictograph sites in the Bread Rocks area if a trail were built through those rock outcroppings.

Aside from our opposition to development in the Indian Bread Rocks area, we applaud your plan's emphasis on maintaining the Dos Cabezas Wilderness as an area untrammeled by man.

We look forward to receiving your final plan and to further involvement in the BLM's development of a management plan for the Dos Cabezas Wilderness. Thank you.

Sincerely,

Michael Julian
Executive Director
Chiricahua Regional Council

RECEIVED
BLM SAFFORD DISTRICT
NOV 30 1994
SAFFORD, ARIZONA

16

Huachuca Audubon Society
PO Box 63
Sierra Vista, AZ. 85636
November 29,1994

Bureau of Land Management
Attn.: Tom Schnell
711 14th Avenue
Safford, AZ. 85546

Re: Dos Cabezas Mountains Wilderness Management Plan and EA. (The Plan).

Dear Mr. Schnell:

16-1 Huachuca Audubon members are avid hikers and have utilized this area often. Consequently we have a vested interest in the proposed wilderness area. We object to: Objective 2, Management of Vegetation, Management Actions (grazing). The Plan proposes to [1] limit utilization of no more than 40% of key species for a period of 3 years. [2] Remove livestock at any time utilization levels exceeds 60%. Many of our members and the Board of Directors feel that this area has been abused by over grazing for years. Considering the current condition of the area we propose a moratorium on livestock grazing for a period of 3 years. In addition grazing in riparian areas should be banned permanently. After the 3 year moratorium the issue should be opened to public input and reevaluated.

Yours Truly

A. Anderson
Board of Directors, HAS

NOV 30 1994

17

Nov 26, 94

Dear Sirs

17-1 I have several comments on the Dos Cabezas Mtns plan. I would like to see further consideration given to limiting the grazing of livestock on the wilderness areas. Plus, it seems that managment should focus more on developing wildlife values - esp. for possible reintroduction of Gould's Turkey and Bighorn sheep.

Also access from west side seems to be a priority.

Please send me a copy of final report.

RECEIVED
BUREAU OF LAND MANAGEMENT
NOV 29 1994
APPROVED DISTRICT
ACTION | DISTRICT | INITIAL | DATE
DIST ADM
EXT AFFAIRS
ASSOC DIR
RENEW RES
ADVISOR
MONITOR
RES ADVISOR
PLANNING
ADMIN
VEGETATION
MAXIMUM
TUCSON FO
SUPERVISOR
LIVE
DISCARD

Thank you

Robert Mossman
4344 E. Hayhurst
Tucson, AZ 85712

18

Nov. 28, 1994

Bureau of Land Management
Safford District Office
711 14th Avenue
Safford, Az. 85546

RE: 8560(045) of 10/17/94

Sirs:

Please send me a copy of the Final Wilderness Management Plan for the Dos Cabezas Mts.

Comment Re: Fire: page 11. The statement "fire as a natural component in the development of the vegetation in this
18-1 area" is not correct. It would be correct to say there hasn't been any fires since livestock grazing began in 1880's. The diversity of both plant and animal life in this area depend upon continued livestock grazing to prevent wildfire.

Comment Re: Access: Page 1 & 20 The statement that
18-2 there is no legal vehicular access to the wilderness is false.

The southwest boundary, on top of the mountain at the Dos Cabezas Catchment (in the west half of Sec. 23 T14S, R27E.) has a public road built by the B.L.M. on public land which the public uses regularly that stops right at the boundary fence. This road was built in 1966 and has been used, without restriction, continuously since then by all sectors of the public. This public road is shown on Map 2, page 5, but was left off Map 1 page 2.

At no place does the Mascot Canyon road enter or
18-3 touch the Wilderness area, Therefore proposal 8, Page 40 should be deleted.

Sincerely,

Keith Klump

NOV 30 1994

19

NOV 30 1994

617 Luna Street
Safford, AZ 85546
November 28, 1994

Bureau of Land Management
Attn: Tom Schnell
711 14th Avenue
Safford, AZ 85546

RE: Proposed Dos Cabezas Mountains Wilderness Area

Dear Tom,

I find no advantage to declaring the area a wilderness area.
19-1 I am not opposed to expending some money to develop trailheads, but we do not need more restrictions on the use of our public lands. The few roads or trails that do enter the area should be left as they are so the permitted ranchers can tend their improvements. These improvements are as essential for wildlife as they are for the ranchers cattle. Wilderness designations are discriminatory to all but the young and vigorous people capable of hiking. Within the past 10 years there are places, in this area, that I have visited in my vehicles that I cannot now visit with my grandchildren. In Wilderness areas, who are we saving them for?

I have been on Dos Cabezas mountain twice during this past year and find it a very enjoyable and beautiful place to be. I know that the current plans will not affect my ability to return to where I visited this year, but with land trades already being proposed in the Dos Cabezas area, I can see the hand writing on the wall. Once a Wilderness area is established, it is easy to add to it.

So, NO we DO NOT want more Wilderness areas, in Dos Cabezas or anywhere else. It is time for the government to start giving back our rights, not taking more!

Sincerely

LJClark

Lee J. Clark

20

COCHISE COUNTY PLANNING DEPARTMENT
1415 W. MELODY LANE, BISBEE, ARIZONA 85603-3080
(602) 432-9450/9451
FAX 432-9429

November 29, 1994

Bureau of Land Management
Attention: Tom Schnell
711 14th Avenue
Safford, Arizona 85546

DEC -1 1994

Re: DRAFT Dos Cabezas Mountains Wilderness Management Plan and Environmental Assessment

Dear Mr. Schnell:

I would first like to thank you for soliciting comments from Cochise County in the above regard. Please note that in providing comments, I will attempt to summarize the major provisions of the Draft Plan to ensure overall understanding on the part of those individuals copied by this letter.

The Draft Management Plan establishes the objectives, policies and actions for managing the Dos Cabezas Mountains Wilderness for the 10-year period 1995-2005. The Plan then sets forth a sequence for implementing these actions.

The Dos Cabezas Mountains Wilderness is located about 12 miles east of Willcox and 40 miles south of Safford. The Bureau of Land Management administers all lands within the wilderness area. The 11,988 acre Dos Cabezas Mountains Wilderness contains a variety of biological, scenic, geological, and recreational values. Two special features enhance the overall values of the area, namely numerous springs with small patches of riparian vegetation having high importance to wildlife and a jumble of highly scenic granite boulders, balanced rocks, and outcrops.

The main issues addressed in the Plan include:

- preservation of wilderness values including naturalness, outstanding opportunities for solitude and primitive recreation;
- management of vegetation;
- recreation developments and visitor services;
- access;
- livestock management;
- wildlife management; and
- management of cultural resources.

The overall objectives of Wilderness management under the plan are:

Objective 1

Maintain or enhance the wilderness values of naturalness, outstanding opportunities for solitude and primitive recreation and special features in the wilderness by:

- allowing natural restoration on 1 mile of closed vehicle trails by the year 2000 in Happy Camp Canyon and around the Indian Bread Rocks picnic area.
- eliminating vehicle trespass by 1995.
- minimizing the impacts of fire suppression by 1995.
- minimizing low level aircraft use (below 2000 feet above ground level) by 1995.
- enhancing opportunities for primitive recreation while minimizing recreation developments within the wilderness by 2000.
- managing cultural resources to minimize human impacts while making them available for scientific research and recreational enjoyment throughout the life of the plan.

Objective 2

Manage ecological condition and allow natural variability during the life of the plan.

Objective 3

Maintain existing essential livestock and wildlife developments while minimizing impacts to the areas wilderness values by:

- using non-motorized, non-mechanical equipment to inspect and maintain developments except Government Peak Slickrock catchment.
- using non-motorized, non-mechanical means to inspect Government Peak Slickrock catchment. Minimize the use of motorized and mechanical equipment to maintain or remove Government Peak Slickrock catchment.
- removing all unnecessary or abandoned developments.

Tom Schnell
November 29, 1994
Page Three

The specific management actions listed within the Plan to accomplish each of the above three objectives have been reviewed by county Planning staff and several members of our Comprehensive Plan committee. Each of the proposed actions appear to be sound and reasonable with the exception of one specific management action proposed under Objective 2 - Management of Vegetation. Specifically, the proposed action seeks to:

> "limit utilization to an average of no more than 40 percent of key species (sideoats grama) in key areas over a period of at least three years. Remove livestock at any time utilization levels on key forage species exceeds 60 percent".

Staff suggests the following verbiage:

20-1 > "Improved grazing management techniques to be employed to limit utilization to an average of no more than 40 percent over a period of at least three years".

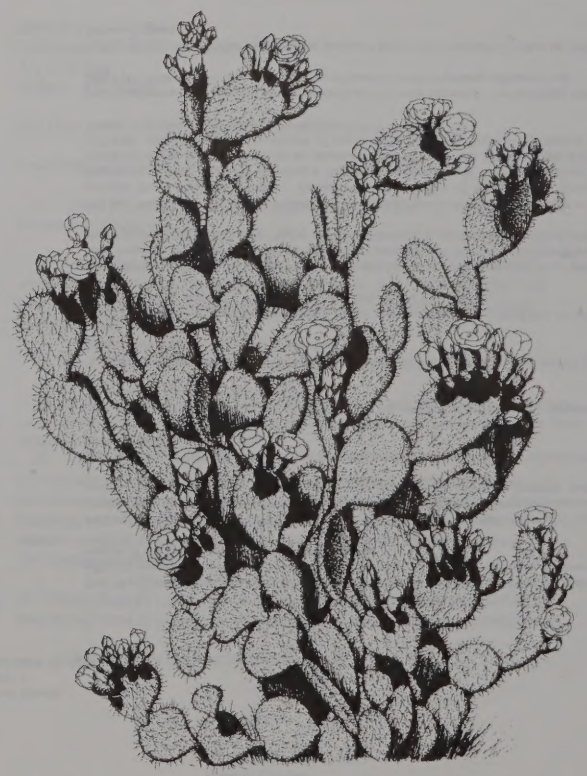
As mentioned in our comments on the Draft Peloncillo Mountains Wilderness Management Plan, the suggested language shifts the emphasis from "removing cattle" as an singular approach to managing vegetative levels to a more positive land management approach of utilizing a wider array of "grazing management techniques" to control the impact of cattle on area vegetation. The overall feeling here is that the 60 percent utilization of key forage would never occur if proper range management techniques were employed at the outset.

Thank you again for allowing the County to comment on this specific Draft Plan. Please copy this department on any subsequent dispositions in this regard. If you have any questions, please contact me at 432-9450.

Sincerely,

James E. Vlahovich
Planning Director

cc: Comprehensive Plan Committee
Judy Anderson, Assistant Planning Director
Board of Supervisors



21

ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY

Fife Symington, Governor Edward Z. Fox, Director

Nonpoint Source Unit,3rd Floor
1-800-234-5677 (Arizona Only)
FAX (602) 207-4528
(602) 207-4535

December 13, 1994

RECEIVED
BLM SAFFORD DISTRICT
DEC 16 1994
SAFFORD, ARIZONA

Mr. Tom Schnell
US-Department of the Interior
BLM-Safford District Office
711 14th Avenue
Safford, Arizona 85546

Re: **Draft Dos Cabezas Mountains Wilderness Management Plan and Environmental Assessment**, Your Letter 10-17-94

Dear Mr. Schnell:

The Department of Environmental Quality, Office of Water Quality, Nonpoint Source Unit (NPS), appreciates the opportunity to comment on the Draft Dos Cabezas Mountains Wilderness Management Plan and Environmental Assessment. The Arizona Department of Environmental Quality offers the following comments:

1. The San Simon River (HUC 15040006-006) was evaluated as partial attaining for Total Dissolved Solids (TDS), sediment, and turbidity in the 1990 305(b) Report, (see enclosed Surface Water Assessment Upper Gila River Basin).

2. The San Simon River (HUC 15040006-006) was evaluated as partial attaining for Total Dissolved Solids (TDS) and turbidity in the 1992 305b Report (see enclosed Surface Water Assessment Upper Gila River Basin).

A surface water hydrologic connection exists between the San Simon River and the Dos Cabezas Mountains Wilderness via unnamed washes by the tributary rule.

The Arizona Department of Environmental Quality recommends that:

1. Where applicable the Management Agency and or Owner/Operator shall over-site any construction to ensure that discharges from the watershed or to all Waters of the State/Waters of the U.S. shall meet all applicable Water Quality Standards;

2. Best Management Practices should be implemented to protect watershed condition, to maintain adequate vegetative cover, and to minimize the discharge of sediment, nutrients, bacteria and manure to the San Simon River via unnamed washes;

3. Best Management Practices should be implemented during and after construction phases to protect riparian areas, to maintain adequate vegetative cover, and to minimize the discharge of sediment, petroleum, nutrients, bacteria and other pollutants to the San Simon River via unnamed washes;

4. Best Management Practices should be implemented to protect riparian areas and the watershed from erosion due to prescribed burns;

5. Best Management Practices should be implemented for construction activities for mechanical equipment to minimize ground disturbance;

6. A monitoring program should be developed to evaluate the effectiveness of implemented Best Management Practices in protecting watershed condition;

7. Sanitary waste facilities during construction phases shall be planned and developed in such a manner to ensure protection of both surface and groundwater resources;

8. As of October 1, 1992, a Clean Water Act, Section 402, NPDES Permit is required for all ground disturbing activities which exceed 5 acres in impact. Contact **Robert Wilson, (602) 207-4574** with the Department of Environmental Quality regarding assistance in applying for this federal permit;

9. A Clean Water Act, Section 404 Permit may be required for the discharge of dredged or fill material into the navigable waters. Contact **Ms. Cindy Lester of the US Army Corp of Engineers at (602) 640-5385** regarding a 404 Permit application. In addition a Section 401 Certification may be required and can be obtained from ADEQ. Contact **Mr. Jim Matt at (602) 207-4502** with the Arizona Department of Environmental Quality, Engineering Review and Permits, for assistance in obtaining certification;

10. Prescribed burns require that air quality concerns and issues be addressed. Contact **Peter Lahm, (602) 207-2356** with the Department of Environmental Quality regarding assistance; and

11. A.A.C. R18-11-109, Surface Water Quality Standards Rules must be complied with as set forth in Section G (enclosed).

XIII3DOS.LTS

RECEIVED
BUREAU OF LAND MANAGEMENT
DEC 16 1994
SAFFORD DISTRICT
ACTION | INITIAL | DATE
DIST. MGR.
ASST. DIST. MGR.
ADMIN. OFFICER
NATURAL RES.
ASST. DIST. MGR.
PLANNING
PLANNING
ASST. DIST. MGR.
RESOURCE
CONTROLLER
P.A.
RESERVED

Tom Schnell
Page 3
December 13, 1994

Enclosed for your information and reference, please find a copy of A.A.C. R18-11-107/108/109, Surface Water Standards Rules. The Arizona Department of Environmental Quality would appreciate receiving information on the progress of this project. Thank you for your cooperation, should you have any questions, please contact me at (602) 207-4535.

Sincerely,

Karl F. Meyer

Karl F. Meyer
Nonpoint Source Unit

KM:km

Enclosures

cc: Vernon L. Saline, BLM - Safford District Office
Pat Mariella, ADEQ
Larry Stephenson, ADEQ
Mike Hill, ADEQ
Kris Randall, ADEQ
Peter Jagow, ADEQ
Dan Salzler, ADEQ

XIII3DOS.LTS

22

Dennis Coules
PO Box 182
Chapel Hill, NC 27514
November 21, 1994

DEC 02 1994

Safford District Office
US Bureau of Land Management
711 14th Ave.
Safford, AZ 85546

RE: Draft Dos Cabezas Mountains Wilderness Management Plan

Dear District Director:

These comments concern the draft management plan for the Dos Cabezas Mountains Wilderness Area.

I strongly urge that the overriding goal of management for all BLM wilderness areas (and all BLM-administered public lands for that matter) be long-term maintenance of native wildlife and plant communities and natural ecological processes.

To that end I have the following specific suggestions:

22-1 (1) Eliminate all cattle grazing that may occur on the wilderness area as soon as contractural requirements permit it, as well as all grazing in contiguous areas from which cattle may stray.

22-2 (2) Identify all adjacent and contiguous roadless areas comprising BLM-administered lands and recommend them for wilderness designation by Congress. Roads between adjacent roadless lands should be closed and rehabilitated to a natural condition as effectively as possible to allow the formation of large "wilderness complexes."

22-3 (3) Reintroduce all locally extirpated species of native plants and wildlife that may be expected to maintain viable populations under wilderness management.

Thank you for considering my comments.

Sincerely,

Dennis Coules

23

UNITED STATES
DEPARTMENT OF THE INTERIOR
FISH AND WILDLIFE SERVICE
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December 2, 1994

In Reply Refer To:
AESO/SE

MEMORANDUM

TO: Area Manager, San Simon Area Office, Bureau of Land Management, Safford, Arizona

FROM: ACTING State Supervisor

SUBJECT: Comments on the Draft Dos Cabezas Mountains Wilderness Management Plan and Environmental Assessment

This memorandum is in response to your 17 October 1994 request for comments on the subject document. The Fish and Wildlife Service (Service) generally concurs with the wilderness management program objectives, management actions, and monitoring proposed for the Dos Cabezas Mountains Wilderness. Implementation of most proposed management actions would promote maintenance and recovery of the area's biotic resources. We offer the following comments and suggestions for improving the document and ensuring that adverse effects to unique or rare biotic communities and special status species are minimized:

23-1 **Page 8, "Wildlife":** The text acknowledges the presence of the American peregrine falcon, *Falco peregrinus anatum*, in the Dos Cabezas Wilderness. However, a number of other federally listed and candidate species may occur in the area as well (see attached list). The text of the management plan and environmental assessment should address management concerns for these species.

Pursuant to section 7 of the Endangered Species Act of 1973 (16 U.S.C. 1534-1544), as amended (Act), Federal agencies are required to review their proposed activities and determine whether any listed species or species proposed for listing may be affected. During the assessment or review process, the Federal lead agency may engage in planning efforts, but may not make any irreversible commitment of resources. Such a commitment could constitute a violation of section 7(d) of the Act. If a listed species may be adversely affected by the proposed action, the Federal lead agency should request, in writing to our office, formal consultation pursuant to section 7 of the Act. Informal consultation may be used to exchange information and resolve conflicts with respect to listed species prior to a written request for formal consultation.

Only listed species receive protection under the Act. However, candidate species should be considered in the planning process in the event they become listed or proposed for listing prior to project completion. Preparation of a biological assessment, as described in Section 7(c) of the Act, is not required for candidate species. If early evaluation of a project indicates that it is likely to adversely affect a candidate species, you may wish to request technical assistance from this office.

Implementation of any management actions that involve surface disturbance should include measures to reduce adverse effects to special status species and unique or rare biotic communities. The Service is particularly concerned about possible adverse effects to the lesser long nosed bat, *Leptonycteris curasoae yerbabuenae* (endangered); the American peregrine falcon (endangered species); the Mexican spotted owl, *Strix occidentalis lucida* (threatened species); and wetland or seep communities at natural or developed springs and tanks.

23-2 **Page 16, "Livestock Management" and "Wildlife Management":** Although no new livestock or wildlife developments would be constructed in the wilderness (page 18), the effects of maintenance activities at existing waters should be minimized or mitigated to protect the unique plant and animal communities that often inhabit these sites. Of particular concern are amphibians and wetland plant species. Although not recorded from the Dos Cabezas Mountains, the lowland leopard frog, *Rana yavapaiensis*, and the Chiricahua leopard frog, *Rana chiricahuensis*, may inhabit springs, streams, and water developments in the wilderness area. Prior to initiating ground-disturbing activities at wetland or aquatic sites, surveys should be conducted for these species. If either of these leopard frogs is found, we recommend you contact this office to discuss measures to avoid or mitigate adverse effects to them.

23-3 **Page 22, 3rd Paragraph:** Possible adverse effects to listed and candidate species should be evaluated during the planning of the proposed prescribed burn in the granitic hills. Although the Service is unaware of any records for Mexican spotted owls in the Dos Cabezas Wilderness, the species occurs nearby in the Chiricahua Mountains and potential habitat exists near Dos Cabezas Peaks. We recommend that Bureau of Land Management (Bureau) staff contact Britta Muiznieks of this office to assist in the identification of potential habitat areas that would be affected by the prescribed burn. If potential habitat exists within the area to be affected by the project, it should be surveyed for Mexican spotted owls in accordance with survey protocols acceptable to the Service prior to completing the planning process. If Mexican spotted owls may be adversely affected by the project, the Bureau would be required to initiate formal consultation with the Service, pursuant to section 7 of the Act. If all effects to the Mexican spotted owl are expected to be beneficial, discountable, or insignificant, the Service would be able to concur with a not likely to adversely affect determination.

23-4 The Dos Cabezas Wilderness is within the range of the lesser long-nosed bat. The Service is concerned that a prescribed burn in this area could damage or kill agaves, *Agave* sp., an important food plant of the lesser long-nosed bat. Pursuant to section 7 of the Act, the Bureau is required to review possible effects of the proposed prescribed burn and initiate formal consultation with the Service if the action may adversely effect this endangered species.

23-5 A prescribed burn could also increase erosion and runoff. This in turn could temporarily degrade water quality and change stream bed topography at wetland sites in and adjacent to the burn area. These changes should be evaluated in terms of their effects on wetland communities. Measures should be included in the burn plan to avoid or minimize adverse effects to wetland sites. The Service strongly recommends that boundaries of the prescribed burn be designed to avoid all impacts to occupied leopard frog habitat, if any is identified in the planning area.

23-6 No surface disturbing activities should occur within 0.5 mile of active peregrine falcon nests between May 15 and July 31. If any surface disturbing activities are proposed for that period, the Bureau should initiate formal consultation with the Service, pursuant to section 7 of the Act.

We appreciate the opportunity to comment on the draft Dos Cabezas Mountains Wilderness Management Plan and Environmental Assessment. Any questions in this matter may be directed to Jim Rorabaugh or Ted Cordery of my staff.

for
Sam F. Spiller

Attachment

cc: Regional Director, Fish and Wildlife Service, Albuquerque, NM (AES)
Director, Arizona Game and Fish Department, Phoenix, AZ
State Director, Bureau of Land Management, Phoenix, AZ
District Manager, Safford District Office, Safford, AZ

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BUREAU OF LAND MANAGEMENT
DEC 0 8 1994
DATE

SPECIES THAT MAY OCCUR WITHIN THE DOS CABEZAS MOUNTAINS WILDERNESS AREA

Endangered
Lesser long-nosed bat (*Leptonycteris curasoae yerbabuenae*)
American peregrine falcon (*Falco peregrinus anatum*)
Bald eagle (*Haliaeetus leucocephalus*)(wintering)

Threatened
Mexican spotted owl (*Strix occidentalis lucida*)

Candidate Category 1
Chiricahua leopard frog (*Rana chiricahuensis*)

Candidate Category 2
California leaf-nosed bat (*Macrotus californicus*)
Mexican long-tongued bat (*Choeronycteris mexicana*)
Chiricahua western harvest mouse (*Reithrodontomys megalotis arizonensis*)
Yellow-nosed cotton rat (*Sigmodon ochrognathus*)
Northern buff-breasted flycatcher (*Empidonax fulvifrons pygmaeus*)
Apache northern goshawk (*Accipiter gentilis apache*)
Ferruginous hawk (*Buteo regalis*)(wintering)
Loggerhead shrike (*Lanius ludovicianus*)
Lowland leopard frog (*Rana yavapaiensis*)
Texas horned lizard (*Phrynosoma cornutum*)
Coppermine milk vetch (*Astragalus cobrensis* var. *maguirei*)
Texas purple spike (*Hexalectris warnockii*)
Bartram's stonecrop (*Graptopetalum bartramii*)

Part VIII — Responses to Comment Letters

The results of public comments have been separated into two sections: BLM's general response to public comment letters and BLM's specific responses.

General Response 1. Wilderness Designation

In the wilderness study process, the mandatory wilderness characteristics for this area were evaluated. Following consideration of public input, recommendations on suitability for wilderness designation were submitted to Congress. The Arizona Desert Wilderness Act of 1990 designated the area described in this plan as the Dos Cabezas Mountains Wilderness. The BLM Safford District has no authority to change this Wilderness Act or BLM Wilderness Management policy. This plan establishes the objectives, policies and actions for managing the Dos Cabezas Mountains Wilderness, rather than determining whether this area should be designated wilderness.

The area designated as the Dos Cabezas Mountains Wilderness will continue to be accessible to the public. Access will not be permitted by motorized vehicle but very little of the area can be traversed by vehicle. While management emphasis in this area will be on the wilderness resource, BLM will continue to manage the wilderness for a variety of other multiple uses that will not degrade the wilderness character. These include livestock grazing, wildlife, cultural resources, outdoor recreation and watershed.

General Response 2. Livestock Grazing

The Dos Cabezas Wilderness was designated in the Arizona Desert Wilderness Act of 1990. Livestock grazing is referenced in the Act in Section 101, Designation and Management (f). It states "(1) Grazing of livestock in wilderness areas designated by this title, where established prior to the date of the enactment of this Act, shall be administered in accordance with section 4(d)(4) of the Wilderness Act..." This section states that livestock are allowed to graze in wilderness. House Report 101-405 (Appendix A to the Arizona Desert Wilderness Act of 1990) states that there shall be no curtailment of livestock grazing just because an area enters the wilderness system.

An average of 40% utilization on key forage species ensures adequate vegetative cover will be left to provide for watershed, wildlife and aesthetic values. Even at 60% utilization of the key species there remains adequate vegetation of less desirable (to livestock) grass plants for other needs. It is the Safford District policy to remove livestock whenever use on key forage species exceeds 60 percent.

Ecological condition studies done in 1994 indicate that 88% of the vegetation in wilderness is in potential natural community or high seral stage status. The Granitic Hills in mid seral condition (11% of the area) are proposed for a prescribed burn to lower the amount of woody vegetation to improve the status to high seral condition. The sand bottom site (1% of the area) will take many years to come

back. These figures and utilization studies do not show that this area is being abused by overgrazing at present. Historical grazing levels practiced from the turn of the century to the 1930s strongly suggest that the area was overgrazed at that time. The drought of the 1950s (the severity of which is estimated to only occur every 300 years) also contributed to the slow response of vegetation. Since livestock levels were adjusted in the early 1980s and improved livestock management practices initiated, overuse by livestock has not occurred.

General Response 3. Grazing in Riparian Areas

With the exception of Tar Box Canyon, riparian areas in the wilderness are made up of small springs. These springs are well scattered in the wilderness so that large cattle concentrations do not occur. Cattle use the spring areas during fall and winters months (the non-growing season for riparian vegetation). Riparian areas are rested during the active growth periods for plants and are therefore not harmed by grazing. There has been no evidence of cattle trampling at the springs. Tar Box Canyon riparian area is a steep, rocky canyon bottom that does not lend itself to continuous use by livestock. Since livestock use this area only during the winter, the cold in the canyon bottom forces them to move out of the bottom to the warmer hillsides. Current livestock management takes into account riparian values. Riparian areas are being protected by good livestock management without the need for fencing of areas. Periodic inspections will be made and if conditions warrant, monitoring specific riparian areas will be initiated

General Response 4. Indian Bread Rocks Trailhead

The Indian Bread Rocks picnic area is located adjacent to the wilderness area along the Happy Camp Canyon Road. This site currently consists of five picnic tables, two grills, a parking area and a primitive restroom. The Bureau has identified this area to use as a trailhead because it is already developed and provides one of the few access points to the wilderness. The developments proposed would simply replace or improve existing facilities. BLM is aware of problems associated with the site but does not believe the improvements will cause an increase in problems. Although this area is identified as a trailhead, there will be no trails developed. The area will simply serve as a point to enter the wilderness.

Public Letter Responses

1-1. Text has been modified to reflect that the rationale for the one time prescribed burn is to allow for natural processes to function on this particular site. The revised rationale is consistent with the Memorandum of Understanding between the Arizona Game and Fish Commission and the Bureau of Land Management.

1-2. See General Response 3.

1-3. Text has been revised to address not only reintroduction of Gould's Turkey but all indigenous species. Also the details of were and how species would be released will be addressed on a case-by-case basis.

1-4. Change has been made.

1-5. See General Response 3.

1-6. Text has been revised to reflect that AGFD will be involved in the evaluation to determine if Government Peak slickrock catchment is necessary and will be involved in the removal of other water developments.

1-7. BLM has not developed standard criteria for properly functioning springs. Text has been modified to reflect what BLM considers properly functioning springs.

1-8. Change has been made.

2-1. Primitive recreation refers to non-motorized and undeveloped types of recreation including hiking, backpacking, camping, wildlife pursuits, etc.

2-2. See General Response 4.

2-3. The text has been modified to reflect use of the wilderness area by Apaches and clarify current socio-cultural use by Native Americans.

2-4. Your offer for assistance is appreciated and we will contact you when implementation of the final plan begins.

3-1. See General Response 1.

4-1. See Public Letter Response 2-3.

4-2. See General Response 3.

4-3. See General Response 2.

4-4. BLM is currently working to secure legal access on these roads and hopes to be completed prior to the year 2000. However, acquiring legal access involves input from many parties and can be a lengthy process. Also BLM workload and statewide access priorities must be considered.

5-1. The Goat Farm or Goat Ranch is private land. The gate referred to is also located on private land. The rancher locks this gate overnight during gathering periods (twice per year) while moving cattle to the headquarters. This ensures that the livestock operation runs smoothly. The remainder of the year the gate is unlocked.

6-1. Access on the Happy Camp Canyon Road currently exists as indicated in the plan. However, the statement that there is no legal access is correct because this road crosses private and state land. BLM has no way to predict what landowners may do in the future, therefore BLM's intent is simply to ensure that access for both recreation and administrative use exists in the future.

7-1. These trails are currently used for recreation and administrative purposes. We anticipate this use to continue at the current level. Maintenance of these trails simply involves the occasional removal of branches encroaching on the trail. If during evaluation of this plan it is determined these trails are no longer necessary, they would be allowed to rehabilitate naturally.

7-2. Wilderness boundary signs have been installed at all accessible points of entry. We are encouraged by the results of the boundary signing effort so far and hope to be able to save the time and cost of installing and maintaining physical barriers.

7-3. See General Response 4.

9-1. See General Response 1.

10-1. See General Response 1.

10-2. As stated in the plan this environmental assessment is tiered to the Safford District Final Wilderness Environmental Impact Statement. This document considered the impacts of wilderness designation on economic conditions and social elements.

11-1. The BLM and AGFD believe that hunting is a legitimate use of the wilderness.

11-2. See General Response 3.

11-3. See Public Letter Response 7-2.

15-1. See General Response 4.

16-1. See General Response 2 and 3.

17-1. See General Response 2 and Public Letter Response 1-3.

18-1. Prior to the introduction of large numbers of livestock during the 1880's, fire played an important role in maintaining the grassland aspect of much of the Dos Cabezas Mountains Wilderness. Periodic fires kept trees and shrub encroachment at a minimum while rejuvenating grass and forb species. Frequency of fires in the wilderness is estimated to be once in every 10 years. Heavy livestock use up until the 1980's reduced vegetation to a point that fires could not play their natural role. With the improved condition of the vegetation in wilderness, fire should again become a naturally occurring event.

18-2. It is true that there is a road that leads to the wilderness boundary near the Dos Cabezas catchment. However, this road is in such poor condition we don't encourage public use.

18-3. The Mascot Canyon Road does not enter or touch the wilderness, however, it does provide access to within approximately one mile of the area. Since this is the only access to the western portion of the wilderness, BLM believes it is important to obtain legal public access along this road.

19-1. See General Response 1.

20-1. We agree with your rationale for the suggested change, however, BLM felt it was necessary to establish an upper limit so it is understood by everyone involved when cattle will be removed.

22-1. See General Response 2.

22-2. The Arizona Desert Wilderness Act of 1990 established the boundaries of the wilderness. Changing the boundaries of the Dos Cabezas Mountains Wilderness is beyond the scope of this Wilderness Management Plan.

22-3. See Public Letter Response 1-3.

23-1. The list of potential special status species was added to the wildlife section on page 7 and 8. Also a section on threatened, endangered, or candidate species was added to part III - Issues resolved through policy or administrative action.

23-2. See Public Letter Response 23-1.

23-3. See Public Letter Response 23-1.

23-4. See Public Letter Response 23-1.

23-5. See response 23-1.

23-6. No surface disturbing activities are proposed within .5 miles of an active peregrine falcon nest.

Part IX — List of Preparers

The following list includes wilderness planning team members, reviewers, preparers, and contributors.

Name	Position
Tom Schnell *	Team Leader/Outdoor Recreation Planner
Manton Botsford *	Archaeologist
Bill Brandau *	Renewable Resources Supervisor
James Gacey *	Wildlife Biologist
Darlene Haegele	Realty Specialist
Rick Belger	Fire Control Officer
Larry Humphrey *	Natural Resource Specialist
Jeff Jarvis *	National Wilderness Program Leader
Ken Mahoney *	Senior Technical Specialist-Wilderness
Kim McReynolds *	Range Conservationist
Delbert Molitor	Hydrologist
Lynn Saline	Area Manager
Larry Thrasher	Geologist

* denotes member of BLM Interdisciplinary Team.

Part IX — List of Preparers

The following list includes wilderness planning team members, reviewers, preparers, and contributors.

Name	Position
Tom Schnell *	Team Leader/Outdoor Recreation Planner
Marion Hosford *	Archaeologist
Bill Donahue *	Renewable Resources Supervisor
James Casey *	Wildlife Biologist
Darlene Hargis	Realty Specialist
Rick Helget	Fire Control Officer
Larry Humphrey *	Natural Resource Specialist
Jeff Jarvis *	National Wilderness Program Leader
Ken Mahoney *	Senior Technical Specialist Wilderness
Kim McKeynolds *	Range Conservationist
Delbert Molitor	Hydrologist
Lynn Saline	Area Manager
Larry Thrasher	Geologist

* denotes member of BLM Interdisciplinary Team.

Appendix A — Developments

Name Of Development	Project Number	Allotment/ Maintenance Responsibility	Location	Condition
Howell Basin Fence	0042	Rough Mountain/ Happy Camp	T14S, R27E Section 18	Good
Dos Cabezas Fence	0072	Rough Mountain/ Happy Camp	T14S, R27E Section 15	Good
Brown Fence	0099	Rough Mountain/ Happy Camp	T14S, R27E Section 10	Good
Spikes Boundary Fence	0302	Rough Mountain/ Happy Camp	T14S, R27E Section 26	Good
Tar Box Exclosure Fence	4721	Rough Mountain	T14S, R28E Section 19	Abandoned
Tar Box Cabin	5314	Rough Mountain	T14S, R28E Section 19	Good
Upper Bear Spring	5313	Rough Mountain	T14S, R27E Section 1	Good
Tar Box Spring	4721	BLM	T14S, R27E Section 19	Abandoned
Bota Chiquita Spring	None	Rough Mountain	T14S, R27E Section 14	Abandoned
Rough Mountain Spring	4669	Rough Mountain	T14S, R27E Section 12	Fair
Spikes-Butler Fence	0305	Happy Camp	T14S, R28E Section 18	Good
Howell Canyon Spring	4835	Happy Camp	T14S, R27E Section 11	Fair
Rough Mountain Trough	4836	Happy Camp	T14S, R28E Section 12	Abandoned
Government Peak Fence	5199	Sheep Canyon	T14S, R28E Section 27	Good
Boundary Fence	1289	Sheep Canyon/ Nine Mile	T14S, R28E Section 15	Good
Sheep Canyon Spring	4415	Sheep Canyon	T14S, R28E Section 22	Poor
Government Peak Masonry Dam	5235	Sheep Canyon	T14S, R28E Section 21	Good
Government Peak Slickrock Catchment	4697	BLM	T14S, R28E Section 17	Good
Spikes-Musnicki Fence	0308	Ninemile	T14S, R28E Section 9	Good
Section 16 Fence	5358	Ninemile	T14S, R28E Section 16	Good

Appendix A — Developments

Appendix B — Operating Guidance for Wildfire Suppression

The following guidance applies to fires out of prescription.

The planned suppression actions herein are based on the prevailing fire danger, fuel conditions, past history of fires in the areas, and impacts on wilderness resources. The actions are divided into two separate fire hazard categories.

Category One Fire Hazard: This category covers a period of time when the relative fire danger is equal to low, moderate, or high. The classification is based on evaluation of fuel moisture, relative humidity, and wind speed. During the (low, moderate) fire danger periods, fires will be difficult to ignite and easy to control. During the (high) fire danger period of Category One, fires will be less difficult to ignite and harder to control.

Category Two Fire Hazard: This category covers a period of time when the fire danger rating is classified as very high to extreme based on an evaluation of fuel moisture, temperature, humidity, weather conditions, and predicted fire behavior. Heavy fuels are very dry and annual growth has cured. Fire behavior will be intense and may be erratic. Rapid rates of spread, crowning, torching, and spotting will occur. Fires may become serious and control difficult unless initial attack contains the fire at small acreages.

On the Safford District, fire danger ratings (low, medium, high, etc.) are generally based on the Burning Index (BI) category of the National Fire Danger Rating System. This rating system is the national standard and is based on input from strategically located Remote Automated Weather Stations (RAWS) throughout the district. Each wilderness area is represented by one or more of these stations. Actual on the ground conditions may vary slightly in individual wilderness areas due to localized winds, temperatures variations and spotty annual precipitations.

Planned Suppression Actions for the Dos Cabezas Mountains Wilderness

Category One Fire Hazard

Establish air or ground surveillance to determine fire location, situation, spread potential and natural barriers. Send initial attack crew and Resource Advisor (Resource Advisor may act out of the district dispatch office). Evaluate fire conditions, fuel, topography and wilderness resource conditions to determine appropriate suppression action. Consider possible fire threat to mountain top radio communication site southeast of the wilderness area or potential to spread and threaten any identified historic structures and sites. Use hand tools only to establish fire lines. Helicopter use requires approval of the District Manager as does air tanker and emergency vehicle use inside the wilderness area.

Category Two Fire Hazard

Establish ground and air surveillance to determine fire location, spread potential, opportunities for use of natural barriers. Send initial attack crew and Resource Advisor immediately. Evaluate wilderness resource considerations, fire condition, fuel and topography. The incident commander will then initiate the appropriate suppression actions. Pay particular attention to adjacent mountain top communication site southeast of the wilderness area, Dos Cabezas community 3 miles southwest of the wilderness boundary, and to any identified historical sites both in or adjacent to the wilderness. Emphasize the use of hand tools as much as possible. Power saws and portable pumps are allowed in the wilderness with DM approval, as are air tankers, helicopters and emergency vehicle use.

Summary of Suppression Actions

Dos Cabezas Mountains Wilderness Area

Category One Fire Hazard	Category Two Fire Hazard
1. Establish ground and/or air surveillance.	1. Establish ground and/or air surveillance.
2. Determine fire location, situation, spread potential, and possible natural barriers.	2. Determine fire location and assess situation.
3. Dispatch initial attack crew and resource advisor immediately (Resource advisor may operate out of dispatch office).	3. Dispatch initial attack crew and resource advisor immediately.
4. Incident commander determines appropriate suppression actions.	4. Incident commander determines appropriate suppression actions.
5. Concentrate on keeping fire away from adjacent mountaintop communication sites and historic buildings.	5. Take swift appropriate suppression action giving priority to methods that least disturb natural and cultural features.
6. Establish fire line using handtools only.	6. Use of chainsaws and water pumps permitted only with district manager approval.
7. Use of helicopters and air tankers permitted only with district manager approval.	7. Use of helicopters and air tankers permitted only with district manager approval.
8. Use of emergency vehicles in wilderness permitted only with district manager approval.	8. Use of emergency vehicles in wilderness permitted only with district manager approval.
	9. Concentrate on keeping fire away from adjacent mountaintop communication sites and historic buildings.
	10. Concentrate on keeping fire away from adjacent community of Dos Cabezas and surrounding areas.

Appendix C — Cultural Resource Use Allocation Categories

The purpose of evaluation is to classify cultural resources in terms of potential alternative use(s).

A. **Scientific Use.** This category applies to any cultural property determined to be suitable for consideration as the subject of scientific or historical study utilizing currently available research techniques.

B. **Conservation for Future Use.** This category is reserved for any unusual cultural resource which is not currently appropriate for consideration as the subject of scientific or historical study that would result in its physical alteration.

C. **Management Use.** This category may be applied to any cultural property considered most useful for controlled experimental study that would result in its physical alteration. Experimental study may be aimed toward a better understanding of kinds and rates of natural or human-caused deterioration, effectiveness of protection measures, and similar lines of inquiry.

D. **Sociocultural Use.** This category may be applied to any cultural resource that is perceived by a specified social and/or cultural group as having attributes that contribute to maintaining the heritage or existence of that group.

E. **Public Use.** This category may be applied to any cultural property found to be appropriate for consideration as an interpretive exhibit in place, a subject of supervised participation in scientific or historical study, or related educational and recreational uses by members of the general public.

F. **Discharged Use.** Assignment to the category means either that a cultural resource was previously qualified for assignment to any of the categories defined above no longer possess the qualifying characteristics for that use or for assignment to an alternative use; or that a cultural property's scientific use potential was so slight that it was exhausted at the time the property was recorded, and no alternative use is deemed appropriate.

Environmental Assessment

Introduction

Background

The Dos Cabezas Mountains Wilderness was designated by Congress on November 28, 1990. A management plan was developed to provide management guidance for the area and is in conformance with the Safford District Resource Management Plan (1991). This environmental assessment (EA) is tiered to the Safford District Final Wilderness Environmental Impact Statement (EIS)(1987). This EA analyzes the potential impacts of the proposed actions and management alternatives that were considered for the plan.

Background information which includes purpose, location, access, and general management situation is provided on pages 1-10 of the proposed Dos Cabezas Mountains Wilderness Management Plan.

Purpose and Need for the Proposed Action

A series of actions were proposed to accomplish objectives that address BLM national wilderness goals and issues identified during development of the wilderness management plan. Proposed actions comply with mandates of the Federal Land Policy and Management Act of 1976, the Wilderness Act of 1964, and the Arizona Desert Wilderness Act of 1990, and are guided by wilderness management policy as outlined in BLM Manual 8560.

Description Of Proposed Action And Alternatives

Proposed Action

The proposed action is the adoption and implementation of the Dos Cabezas Mountains Wilderness Management Plan. In general, the proposed actions would provide for the protection and enhancement of wilderness values within a 10 year time frame. The proposal includes measures to protect existing natural resources and values as well as allowing for the maintenance of existing range, wildlife and cultural developments. Under the proposed action, opportunities for solitude and primitive unconfined recreation would be maintained. Proposed management actions that could have environmental effects are listed below.

1. Install and maintain wilderness boundary signs by 1995 at all accessible points of entry, with special emphasis on the Happy Camp Canyon and the Indian Bread Rocks areas. If signing is not adequate to eliminate unauthorized vehicle entry, install physical barriers outside the wilderness.

2. At a minimum, conduct monthly wilderness patrols. Boundary signs will be maintained as needed.

3. Adopt the fire management techniques found in Appendix B of the proposed Dos Cabezas Wilderness Management Plan.

4. In accordance with the Memorandum Of Understanding with Arizona Game and Fish Commission, the AGFD will conduct one annual low level big game species survey flight between December 1 and February 28. AGFD will attempt to schedule the survey flight to occur during a weekday, and will notify the Area Manager as soon as possible if additional survey flights are necessary.

5. Maintain existing Tar Box and Upper Bear Spring trails.

6. No new recreation developments will be built in the wilderness.

7. Develop a minimum trailhead at the Indian Bread Rocks picnic site, consisting of an information kiosk, visitor register, a restroom and parking for 5 cars by 1997.

8. Acquire legal public access along the Happy Camp Canyon and Mascot Canyon Roads by 2000.

9. Conduct cultural resource reconnaissance inventory, evaluate and allocate identified cultural resources to use categories annually during plan review.

10. Discontinue use of Tar Box Cabin for storage by 1995. Cancel the cooperative agreement with the rancher.

11. Limit utilization to an average of no more than 40 percent of key species in key areas over a period of at least three years. Remove livestock at any time utilization levels on key forage species exceeds 60 percent.

12. Use prescribed burning to change granitic hills site from mid seral to high seral stage in 1995. An operational site specific burn plan will be prepared prior to the prescribed burn and a smoke permit will be obtained. Control lines will not be constructed, natural features will be used to confine the fire. Following prescribed burning the area will be evaluated to determine the length of rest from livestock grazing.

13. Allow prescribed natural ignition fires to burn within prescription.

14. Inspection and maintenance of all range developments using non-motorized and non-mechanical means will be added as a Term and Condition of grazing permits.

15. Inspect and evaluate need for Government Peak Slickrock catchment by July 1995.

16. Remove unnecessary or abandoned developments including Tar Box Exclosure Fence, Tar Box Spring, Rough Mountain Trough and Bota Chiquita Spring developments using non-motorized, non-mechanical means by 1996.

Alternative A — No Action Alternative

Under the no action alternative, management guidance would be provided by the Wilderness Act of 1964, the Arizona Desert Wilderness Act of 1990, and national BLM Wilderness Management Policy. No specific action would be taken to remove abandoned range and wildlife developments. Visitor use would continue

unmonitored and a trailhead would not be developed. Prescribed burning would no be used to change certain ecological sites to higher seral condition. All wildfires would be suppressed in the wilderness.

Alternative B — Minimum Human Impact

An emphasis on protecting the resources within the Dos Cabezas Mountains Wilderness from all human impacts would be the overriding goal of this alternative. No new range or wildlife developments would be allowed. Recreation use would be restricted or excluded, if necessary, to reduce or prevent human impact. Use of motorized equipment would not be allowed.

Affected Environment

A description of the affected environment can be found on pages 1-12 of the Dos Cabezas Mountains Wilderness Management Plan and in the Affected Environment sections of the Safford District Resource Management Plan and the Safford District Wilderness EIS.

Environmental Consequences

The following critical elements have been analyzed and would not be adversely affected by the proposed action and alternatives:

1. Air Quality
2. Areas of Critical Environmental Concern
3. Cultural Resources
4. Prime or Unique Farmlands
5. Floodplains
6. Native American Religious Concerns
7. Solid or Hazardous Wastes
8. Water Quality
9. Wetlands and Riparian Zones
10. Wild and Scenic Rivers
11. Wilderness
12. Threatened or Endangered Species

Impacts of the Proposed Action

Implementation of the management actions in the proposed action alternative would maintain or enhance the wilderness resources while allowing for use of the area to continue.

Construction of a trailhead adjacent to the wilderness would have no impact to the wilderness but would serve to provide parking and other visitor services at the appropriate location, as well as, information on location of wilderness boundary and proper wilderness etiquette.

Temporary impacts to solitude may occur during removal of the two wildlife developments and the two range development. These impacts would be offset in the long term by eliminating visual impacts of the developments and maintenance requirements.

Aerial monitoring of wildlife species would have a temporary impact to solitude and naturalness. These monitoring flights would enhance wilderness values in the long term by assuring the opportunities to observe and hunt these species in a wilderness setting.

The combination of wilderness boundary identification and regular patrols will eliminate unauthorized vehicle use. Elimination of vehicle trespass will allow natural rehabilitation of vehicle trails resulting in maintaining or enhancing wilderness values.

Cultural resource reconnaissance inventory, evaluation and allocation of cultural resources to use categories will provide a framework for their proper management. Discontinuing use of the Tar Box cabin for storage will ensure that this cabin is not degraded through that use.

Maintaining and inspecting all range, wildlife, and cultural developments, with the possible exceptions of Government Peak Slickrock Catchment, by nonmotorized/nonmechanized means will enhance wilderness values. Using motorized equipment for maintenance of the three exception will cause short term impacts to naturalness and solitude. These temporary impacts would only occur only once every 5 -10 years.

Using prescribed burning and prescribed natural fires would enhance wilderness values by increasing plant diversity and minimizing potential impacts from fire suppression activities.

Impacts of Alternative A — No Action

Current conditions and opportunities would be maintained under this alternative. With this alternative, existing laws, regulations, and policies would be followed without an integrated management strategy. There would be no temporary impacts from removal of two wildlife developments and two range developments or from monitoring recreation activities. In the long term, wilderness values would be affected by the continuing presence of these unnatural human developments and the need for maintenance.

A trailhead would not be developed and the indirect benefits of such a development would not occur.

Temporary impacts to solitude would result from fire suppression activity as well as long term impact to naturalness from not allowing fire to play its natural role in the wilderness.

Not allowing prescribed burning for the identified ecological sites would result in not moving to the next seral stage. This would lessen plant diversity and density. Temporary impacts from prescribed burning activities would not occur.

Impacts from wildlife management activities would remain the same as the proposed action.

Impacts of Alternative B — Minimum Human Impact

An emphasis on protecting the resources within the Dos Cabezas Mountains Wilderness from all human impacts would be the overriding goal of this alternative.

Restricting or excluding recreation use to reduce or prevent human impact would provide the most protection of wilderness values but could restrict personal choice in the full range of opportunities for primitive recreation.

Eliminating use of all motorized equipment would eliminate temporary impacts on opportunities for solitude during the use of this equipment and any long term impact to naturalness resulting from motorized equipment. However eliminating use of all motorized equipment may limit spread and growth of certain wildlife species.

Cumulative Impacts

Cumulative impacts include impacts on the environment which result from incremental impacts of the proposed action when added to other past, present, and reasonably foreseeable future actions. Cumulative impacts can result from individually minor, but collectively significant actions taking place over a period of time.

The combination of wilderness boundary identification and regular patrols will eliminate unauthorized vehicle use. Elimination of vehicle trespass will allow natural rehabilitation of vehicle trails. Implementing these actions would reduce the potential for cumulative impacts to wilderness values.

Removing two wildlife developments and two range development would reduce potential for cumulative impacts by significantly reducing visual impacts of these developments.

The proposed minimum tool for maintaining existing range and wildlife developments also reduces the potential for cumulative impacts to wilderness values.

No other cumulative impacts have been identified with any of the proposed actions.

Mitigation

There are no mitigation measures needed for the proposed action.

Consultation and Coordination

Information about consultation, coordination, and public involvement can be found in Part VII of the Dos Cabezas Mountains Wilderness Management Plan.

Finding of No Significant Impact/Decision Record

Dos Cabezas Mountains Wilderness Management Plan

Environmental Assessment No. AZ-040-04-28

Decision: It is my decision to approve the Dos Cabezas Mountains Wilderness Management Plan. The plan establishes management direction for the Dos Cabezas Mountains Wilderness for a 10-year period.

Finding of No Significant Impact: Based on the analysis of potential environmental impacts contained in the attached Environmental Assessment, I have determined that impacts are not expected to be significant, therefore, an Environmental Impact Statement is not required.

Rationale for Decision: The plan provides for the continued maintenance of wilderness values and the rehabilitation of existing disturbances. Routine monitoring and yearly evaluations provide for modifications to the plan if a change in conditions requires them.

Other Alternatives Considered: The Proposed Action, Minimum Human Impact Alternative and No Action Alternative were considered.

Mitigation/Stipulations: All mitigation measures are incorporated within the proposed action.

Recommended by: _____ 5/18/95
Area Manager, San Simon Resource Area — Date

Recommended by: _____ 5/18/95
District Manager, Safford District — Date

Approved by: _____ 5-30-95
State Director, Arizona — Date

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Finding of No Significant Impact/Decision Record

Catoctin Mountain Wildfire Management Plan

Environmental Assessment No. [illegible]

Decision: It is my decision to approve the [illegible] Mountain Wildfire Management Plan. The plan [illegible] direction for the [illegible] Mountains [illegible] period.

Finding of No Significant Impact: [illegible] potential environmental impacts [illegible] Environmental Assessment. [illegible] impacts are not expected to be significant. [illegible] Statement is not needed.

Rationale for Decision: The plan provides for the [illegible] of wildfires [illegible] and the rehabilitation of [illegible]. Routine monitoring and [illegible] between the modifications to the plan if a change in conditions [illegible].

Other Alternatives Considered: The [illegible] Alternative, Wildfire [illegible] Alternative and No Action Alternative were considered.

Mitigation/Stipulations: All mitigation measures are incorporated within the proposed action.

Recommended by: [signature] 5/8/95
[illegible] Superintendent, Catoctin Mountain Park — Date

Recommended by: [signature] 5/8/95
[illegible], National Capital Region — Date

Approved by: [signature] 5-8-95
Director, Intermountain Region — Date

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